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BEFORE THE  
SURFACE TRANSPORTATION BOARD

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Finance Docket No. 35239

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ALLEGHENY VALLEY RAILROAD COMPANY –  
PETITION FOR DECLARATORY ORDER

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**THE BUNCER COMPANY'S**  
**RESPONSE TO ALLEGHENY VALLEY RAILROAD COMPANY'S**  
**REBUTTAL**

ENTERED  
Office of Proceedings  
JUN 25 2009  
Part of  
Public Record

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**ATTORNEYS FOR  
THE BUNCER COMPANY**

Dated: June 25, 2009



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SURFACE TRANSPORTATION BOARD

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**THE BUNCHER COMPANY'S**  
**RESPONSE TO ALLEGHENY VALLEY RAILROAD COMPANY'S**  
**REBUTTAL**

Pursuant to a Motion for Leave filed in this proceeding simultaneously herewith, The Buncher Company ("Buncher") hereby submits this Response to Allegheny Valley Railroad Company's Rebuttal ("Response"). The filing of this Response has been necessitated by the new factual claims and related legal arguments made by the Allegheny Valley Railroad Company ("AVRR") in its Rebuttal. After Buncher submitted evidence in its Reply that the relevant portion of the Valley Industrial Track between milepost 0.3 and milepost 0.6 which previously existed on Buncher's property had been abandoned by Consolidated Rail Corporation ("Conrail") in 1984, AVRR changed course and now claims, without independent corroboration, that Conrail operated over two separate, parallel "lines of railroad" in the same one-block area bounded by 16th and 21st Streets in the Strip District. AVRR alleges that both of those lines of railroad were referred to by Conrail as the Valley Industrial Track and that both had the same milepost designations.

As explained herein, AVRR's new theory is inconsistent with independent evidence from the United States Railway Association's Final System Plan, from the deed by which the Penn Central Transportation Company ("PCTC") transferred the relevant property to Conrail, and



from Conrail's own records. Moreover, the totality of facts and circumstances prior and subsequent to the abandonment of the relevant portion of the Valley Industrial Track and the Fort Wayne Connecting Track by Conrail in 1984 – including the sale of all property to third parties, removal of all trackage, paving and grading of the entire area for non-railroad use, and complete cessation of rail operations west of 21st Street in the Strip District – confirms that Conrail intended to abandon and remove the entire section of trackage between 16th and 21st Street from its interstate rail network long before its 1995 transaction with AVRR.

## **I. Background**

In its Petition for Declaratory Order (“Petition”), AVRR claims that it has common carrier rights over a rectangular strip of property owned by Buncher between 16th Street and 21st Street in Pittsburgh’s Strip District. Conrail sold this property to Buncher in 1983, subject to a reserved easement to “continue to operate over and maintain its so-called Valley Industrial Track” which at the time traversed the Buncher property between approximately milepost 0.3 at 16th Street and approximately milepost 0.6 at 21st Street. The Valley Industrial Track was removed from the Buncher property at some point between Conrail’s abandonment in 1984 and 1988. There has been no trackage on the Buncher property for more than 20 years and no rail service has been provided on that property for more than 25 years.<sup>1</sup>

In Buncher’s Reply to Allegheny Valley Railroad Company’s Petition for Declaratory Order (“Reply”), Buncher submitted proof that Conrail had filed for and obtained abandonment authority from the Interstate Commerce Commission (“ICC”) in 1984 pursuant to the Northeast Rail Services Act (“NERSA”) for the same portion of the Valley Industrial Track between milepost 0.3 at 16th Street and milepost 0.6 at 21st Street. This grant of abandonment authority

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<sup>1</sup> See Verified Statement of Joseph M. Jackovic attached to Buncher’s Reply to the Petition for Declaratory Order (“Jackovic First V.S.”) at 3.



terminated any ICC jurisdiction over the Buncher property.<sup>2</sup> Conrail initiated this abandonment process under NERSA only two months after selling the relevant property to Buncher.<sup>3</sup> After Conrail obtained this abandonment authority and years before Conrail's transaction with AVRR, the trackage on Buncher's property was removed, the entire area was filled, graded and prepared for non-railroad use, and Buncher demarcated the boundaries of its property with jersey barriers, all without objection by Conrail.<sup>4</sup>

In its Rebuttal, AVRR concedes that the ICC in 1984 authorized Conrail to abandon a portion of the Valley Industrial Track between 16th Street and 21st Street.<sup>5</sup> However, to Buncher's great surprise, AVRR claims for the first time in its Rebuttal that two parallel and separate lines of railroad – both allegedly named the "Valley Industrial Track" and both purportedly having the same milepost designations – traversed the one-block area of land between Smallman Street and Railroad Street that is bounded by 16th Street and 21st Street in the Strip District. AVRR further claims that the 1984 Conrail abandonment only applied to the

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<sup>2</sup> See Reply at 14-15; Lucas v. Township of Bethel, 319 F.3d 595 (3rd Cir. 2003). The 1984 Conrail abandonment also included the Fort Wayne Connecting Track (including the lower level of the Fort Wayne Bridge) from a point on the opposite side of the Allegheny River to the connection with the Valley Industrial Track. See Jackovic First V.S. at 5-6.

<sup>3</sup> As noted in Buncher's Reply, Conrail may have reserved the track easement because of a belief that Buncher might be interested in rail service, or because conveying the property to Buncher without reserving the easement might have required ICC authorization. The scope of the reserved easement, which is limited to operating over and maintaining a track which no longer exists, is quite narrow. AVRR's attempt to interpret the scope of the easement expansively (by, for example, asserting that standard deed language on damages would give the easement holder the right to build underground tunnels or overhead ramps on the Buncher property) is without foundation.

<sup>4</sup> See Jackovic First V.S. at 5-6.

<sup>5</sup> See Verified Statement of Russell A. Peterson in Rebuttal to the Reply of the Buncher Company ("Peterson Rebuttal V.S.") at 6. AVRR also takes "no exception" to Conrail's "consummation of the 1984 abandonment of the Fort Wayne Connecting Track on the lower deck of the Fort Wayne Bridge." Id.



“Valley Industrial Track” which extended along Smallman Street (also referred to by AVRR as part of the “former Allegheny Secondary”), and that AVRR’s purported easement rights relate to a different but parallel “Valley Industrial Track” which extended from Railroad Street (also referred to by AVRR as part of the former “Allegheny Branch”). AVRR makes these claims despite the fact that, under its theory, the supposed “Valley Industrial Track” along Smallman Street would have the same name, same mileposts, and same coordinates between 16th Street and 21st Street as the Valley Industrial Track that traversed Buncher’s property.

**II: AVRR’s Claim That Two Separate, Parallel Lines of Railroad Named “Valley Industrial Track” Extended Between 16th Street and 21st Street Is Unsupported by Any Independent Evidence**

Buncher has filed this Response in order to demonstrate that – despite AVRR’s self-serving, anecdotal, and uncorroborated explanation– the independent factual evidence leads to the conclusion that only one “line of railroad” subject to ICC abandonment jurisdiction existed between 16th Street and 21st Street, and that Conrail abandoned this line of railroad and associated tracks in 1984, making the parcel of land at issue no longer subject to the Board’s jurisdiction.

**A. AVRR’s Claim About A Second Line of Railroad Also Called The “Valley Industrial Track” Is Inconsistent With the Conrail Abandonment Application**

AVRR claims that the Valley Industrial Track abandoned by Conrail in 1984 is different from an allegedly separate but parallel Valley Industrial Track that once traversed the relevant parcel of land owned by Buncher between 16th Street and 21st Street in the Strip District.

AVRR’s claim is based solely on its interpretation of certain Exhibits attached to Conrail’s 1984 abandonment filing.<sup>6</sup> Exhibit B to the Conrail abandonment filing contains a small, high-level

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<sup>6</sup> See Exhibit F to Jackovic First V.S. at 8.



map which appears to show the general location of the Valley Industrial Track that was abandoned by Conrail, its connection with the Fort Wayne Connecting Track and its location relative to the south bank of the Allegheny River and certain other connecting rail lines and major thoroughfares in the general vicinity.

In its Rebuttal, AVRR has highlighted in yellow what it claims is the “other” Valley Industrial Track.<sup>7</sup> However, the Conrail map does not identify the line highlighted in yellow by AVRR as the Valley Industrial Track and contains no reference points to determine with any accuracy that AVRR is identifying the former track that existed on Buncher’s property. The Conrail abandonment application itself also contains no reference to different Valley Industrial Tracks on Smallman Street or Railroad Street, and provides no independent corroboration for the theory that AVRR now espouses.

Given the numerous tracks that existed in that general area between 16th Street and 21st Street at the time, and the lack of adequate detail in Conrail’s map,<sup>8</sup> it is impossible to determine with any certainty what particular track is represented by AVRR’s highlighted yellow line on the abandonment map and whether that track was a separate line of railroad. Moreover, as explained below, the map contains a reference point which contradicts AVRR’s claim.

The yellow line drawn by AVRR on the map extends from a point where the highlighted track line on the Conrail map stops, at or near milepost 0.66 (21st Street), further south to the 16th Street bridge (which is depicted by the horizontal band on the map crossing the Allegheny River and connecting to Chestnut Street). As noted above, this yellow line represents AVRR’s

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<sup>7</sup> See Exhibit D to Peterson Rebuttal V.S.

<sup>8</sup> This complicated network of tracks is shown in the Map attached as Exhibit A to the Verified Statement of Joseph M. Jackovic in Response to the Rebuttal of Allegheny Valley Railroad Company (“Jackovic Second V.S.”) that is attached hereto and incorporated by reference herein.



attempt to depict the Valley Industrial Track extending from Railroad Street as a separate but parallel “line of railroad” in the area between 21st Street (approximately milepost 0.6) and 16th Street (approximately milepost 0.3). However, at the time of the Conrail abandonment filing in 1984, the trackage on Buncher’s property still existed (even under AVRR’s version of events, for it claims the trackage was used by Conrail to provide transloading service at the Pittsburgh Produce Terminal). Thus, there is no logical reason why the portion of this alleged separate line of railroad from 21st Street to 16th Street would not be marked on the Conrail map if the portion extending northeast from 21st Street was so marked. The Conrail map from 1984 explicitly shows this unidentified track line terminating near 21st Street. For the foregoing reasons, Buncher respectfully submits that AVRR’s line-drawing exercise is an insufficient evidentiary basis upon which to conclude that Conrail’s abandonment applied to a different Valley Industrial Track.

AVRR also claims that the reference near the top of Exhibit B of the Conrail abandonment filing to the Valley Industrial Track as being “(Formerly Allegheny Sec.)” somehow proves that the abandoned line of railroad differs from the track which crossed the Buncher property. According to AVRR, there were two parallel lines of railroad with the same name, same mileposts, and same endpoints, providing separate routes through the Pittsburgh Produce Yards area that extended between 16th and 21st Street.<sup>9</sup> AVRR claims that one Valley Industrial Track extended along Smallman Street (which AVRR refers to as the former “Allegheny Secondary”) and the second Valley Industrial Track extended across the Buncher property to Railroad Street (which AVRR refers to as the former “Allegheny Branch”).<sup>10</sup>

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<sup>9</sup> Although AVRR claims there were only two routes through the area, the maps of the relevant tracks indicate otherwise. See, e.g., Exhibit A to Jackovic Second V.S.

<sup>10</sup> See Peterson Rebuttal V.S. at 6-7.



AVRR, despite having access to valuation maps and other information from its transaction with Conrail, has not submitted any map or other independent evidence which conclusively supports its claim that two separate, parallel lines of railroad named “Valley Industrial Track” (one part of the so-called Allegheny Branch and one part of the so-called Allegheny Secondary) extended through the relevant area. Moreover, as explained in the following section, the reference in the Conrail Exhibit to the “former Allegheny Secondary” actually contradicts AVRR’s theory because Conrail adopted the convention of referring to its line of railroad between 16th and 21st Street as the Allegheny Secondary in the late 1970’s. Thus, the reference in the Conrail abandonment map from 1984 is entirely consistent with its abandonment of the trackage on Buncher’s property.<sup>11</sup>

**B. 1975 USRA Preliminary and Final System Plans and PCTC Deed from 1976 Identify Only One Line of Railroad Between 16th Street and 21st Street For Transfer to Conrail**

In its Preliminary System Plan from February 1975 and its Final System Plan from July 1975, the United States Railway Association (“USRA”) identified the lines of railroad that it recommended for transfer to Conrail.<sup>12</sup> The relevant portion of Conrail’s system between 16th Street and 21st Street was included by the USRA within Line Code 2229. In the Final System

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<sup>11</sup> AVRR also claims that the reference on Exhibit C of the Conrail abandonment filing to a “former overhead route” with “no originating or terminating traffic during last 12 months” somehow establishes that the abandoned Valley Industrial Track is different from the Valley Industrial Track easement reserved by Conrail. Once again, this isolated reference provides no evidence that a second line of railroad existed between 16th Street and 21st Street in the Strip District or that Conrail intended to do anything other than terminate all of its common carrier operations between 16th Street and 21st Street.

<sup>12</sup> Relevant pages of the USRA Preliminary System Plan and Final System Plan are attached to the Jackovic Second V.S. as Exhibit B. USRA used Line Numbers to identify the lines of railroad under consideration and Line Codes to designate the lines of railroad that it recommended for transfer to Conrail.



Plan “Section A Rail Line Tables,” Line Code 2229 is identified as part of the Allegheny Branch and contains the following three contiguous segments:

- Pittsburgh 11th Street to Pittsburgh 57th Street: MP 0.2-4.6
- Pittsburgh 57th Street to New Kensington: MP 4.6-18.6
- New Kensington to Arnold: MP 18.6-19.51<sup>13</sup>

There is no reference in the Final System Plan to another, separate line of railroad (Allegheny Secondary or otherwise) extending through the area between 11th Street and 57th Street. Moreover, the 1976 Deed pursuant to which PCTC transferred Line Code 2229 to Conrail makes reference only to the “line of railroad known as the Allegheny Branch” extending from 11th Street northeast to Nadine, Oakmont and Logan’s Ferry within Allegheny County.<sup>14</sup> The purported easement that AVRRI acquired from Conrail in 1995 also makes reference to the Valley Industrial Track between milepost 0.3 and milepost 0.6 as being part of the premises identified by Line Code 2229.

The Line Numbers used by the USRA in the Preliminary and Final System Plans alternatively refer to different portions of this line of railroad on the south slope of the Allegheny River as the Allegheny Branch or the Allegheny Secondary Track. However, it is clear from the descriptions in the USRA records that these alternative references apply to a contiguous line of railroad (and associated sidings and other tracks) extending from the 11th Street area northeast to New Kensington.<sup>15</sup> Regardless of the potential confusion over the alternating use of the terms

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<sup>13</sup> See Exhibit B to Jackovic Second V.S. at page 274.

<sup>14</sup> See Exhibit C to Jackovic Second V.S. at Deed Book Volume 6001, Page 606.

<sup>15</sup> For example, USRA described Line No. 315 as a “Portion of Allegheny Branch” that “extends northeastward from Pittsburgh (see Line No. 650a).” USRA described Line No. 650a, which extended from the end of Line No. 315 and included the former trackage at issue here, as a



Allegheny Branch and Allegheny Secondary by the USRA, the 1976 Deed from PCTC to Conrail confirms that all of these tracks between 16th Street and 21st Street were part of a single line of railroad referred to as the Allegheny Branch and included within Line Code 2229.

**C. Conrail Records Confirm That Its 1984 Abandonment Included the Parcel of Land at Issue**

As noted above, the 1976 Deed pursuant to which PCTC transferred Line Code 2229 to Conrail refers to the line of railroad from Pittsburgh 11th Street northeast to Logan's Ferry as the Allegheny Branch. Shortly after Conrail acquired this line of railroad, it appears to have adopted the convention of referring to the segment between 16th and 21st Street as the Allegheny Secondary Track. Conrail's Track Charts from 1977 and 1983 (at the time of the Buncher conveyance and prior to the NERSA abandonment filing) refer to the section between Pittsburgh (11th) and Nadine/Red Bank as the Allegheny Secondary Track from milepost 0.0 to milepost 63.4. The charts also refer to this segment as part of Line Code 2229.<sup>16</sup> There is no reference in these charts to any separate "Allegheny Branch" trackage in the same vicinity.

Conrail's 1984 abandonment filing referred to the portion of the Valley Industrial Track between the Fort Wayne Connecting Track and 21st Street as part of the former Allegheny Secondary, consistent with the earlier convention adopted by Conrail. The abandonment removed this line of railroad and associated tracks between 16th and 21st Street, and Conrail's connection with the lower level of the Fort Wayne Bridge, from Conrail's system. Subsequent maps of the Conrail system show an unmistakable gap in the rail line on the south slope of the Allegheny River in the area formerly occupied by Pennsylvania Railroad's 11th Street yard, 16th

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"Portion of the Allegheny Secondary Track." See Exhibit B to Jackovic Second V.S. at pages 408-410, 423-425.

<sup>16</sup> See Exhibit D to Jackovic Second V.S.



Street yard, and the Pittsburgh Produce Yards area up to 21st Street. These tracks were removed from Conrail's network.<sup>17</sup>

At some point between 1983 and 1994, prior to the transaction with AVRR, Conrail begins referring in its track charts to the remaining portion of the line of railroad east of 21st Street (starting at milepost 0.6) as the Valley Industrial Track. For example, Conrail's Track Chart from 1994 lists three separate sections of the "Valley I.T." – (i) the segment between Pittsburgh and the Junction with the Coleman Secondary (milepost 0.6 to milepost 4.7),<sup>18</sup> (ii) the segment between Aspinwall and Nadine (milepost 1.8 to milepost 2.7); and (iii) the segment between Nadine and Arnold (milepost 2.7 to milepost 13.4).<sup>19</sup> The 1994 track charts do not contain any reference to AVRR's claim that the Valley Industrial Track consisted of two separate lines of railroad, one part of the Allegheny Branch and one part of the Allegheny Secondary.<sup>20</sup>

Even if the Board determines that there may have been two separate portions of the Valley Industrial Track in the one-block area between Smallman Street and Railroad Street

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<sup>17</sup> See, e.g., Exhibit E to Jackovic Second V.S., where the inset map of Pittsburgh trackage shows a gap on the line now owned by AVRR that extends out to New Kensington.

<sup>18</sup> This segment starts at 21<sup>st</sup> Street (milepost 0.6) because the 1984 abandonment removed the segment of the Valley Industrial Track between 16<sup>th</sup> and 21<sup>st</sup> Street (milepost 0.3 to milepost 0.6) from Conrail's system.

<sup>19</sup> See Exhibit F to Jackovic Second V.S.

<sup>20</sup> Buncher suspects that AVRR may be confusing this alleged second "Valley Industrial Track" along Smallman Street with the "Allegheny Valley Industrial Track." See Exhibit G to Jackovic Second V.S., which is a PCTC map from 1976 which shows that the Allegheny Valley Industrial Track ran in a general northeasterly direction in a bell curve from 16th Street towards the Allegheny River, then connecting back with the Valley Industrial Track that existed along Buncher's current property at a point between 19th Street and 20th Street. In 1978, PCTC transferred to Buncher the parcel of land which included the Allegheny Valley Industrial Track and two other tracks not relevant here. This is a different parcel of land from the rectangular property at issue in this proceeding. See Exhibit E to Jackovic First V.S. at 1.



bounded by 16th and 21st Streets, it still must conclude that it has no jurisdiction over the Buncher property. The 1984 Conrail abandonment makes reference only to the Valley Industrial Track extending between 11th Street (milepost 0.0) and 21st Street (milepost 0.6). The subsequent removal of all tracks to the west of 21st Street and the complete cessation of all rail operations in this area confirms that the 1984 abandonment applied to the entirety of Conrail trackage in this area.

Whether the Board construes the 1984 abandonment as including all associated yard tracks, sidings and other excepted tracks, or whether the Board considers those other tracks to be excepted tracks outside the ICC's abandonment jurisdiction, the result is the same – Conrail obtained ICC authority in 1984 to abandon its common carrier operations between, *inter alia*, 16th Street and 21st Street. At that point, the ICC's jurisdiction over the trackage extending between 16th Street and 21st Street, on the parcel of land at issue in this proceeding terminated. Conrail's subsequent actions with respect to its trackage and service in that area confirm that its intent was to abandon all operations west of 21st Street. Shortly after obtaining the ICC abandonment authority, Conrail's trackage was completely removed, the right-of-way was filled, graded and prepared for non-railroad use, and Conrail ceased all rail operations in that area.<sup>21</sup>

### **III. AVRR Disregards the Fact That Current Abandonment Requirements Did Not Apply To The 1984 Conrail Abandonment Under NERSA**

AVRR recognizes in its Rebuttal that the 1984 Conrail abandonment of the Valley Industrial Track was filed under NERSA. However, AVRR continues to disregard its significance. In an attempt to distinguish the holding in Township of Bethel, AVRR asserts that Conrail's abandonment authority was conditioned upon Conrail's filing of a notice of

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<sup>21</sup> The assertions by AVRR about railroad service continuing over the purported easement between 1983 and the present (see Peterson Rebuttal V.S. at page 7, footnote 2) are contradicted by the evidence.



consummation with the ICC. See, e.g., Peterson Rebuttal V.S. at 9 (claiming that notice of consummation is the “definitive document needed to effectuate abandonment authority”). As AVRR concedes on page 17 of its Rebuttal Legal Argument, however, there was no legal requirement to file a notice of consummation in order to terminate the ICC’s jurisdiction over the Conrail trackage. Although the ICC decision granting the abandonment authority asked Conrail to file a letter notifying the ICC of the date as of which Conrail had exercised the abandonment authority, this notice letter was not a condition to Conrail’s exercise of that authority.

Moreover, AVRR relies on an unrealistic standard for determining whether an abandonment of the Conrail easement occurred under state law. Buncher will not debate the point extensively here because it is an issue of Pennsylvania real estate law over which the Board does not have jurisdiction. However, Buncher notes that nothing other than the filing of a notice of consummation by Conrail with the ICC (which was not required by law) would satisfy AVRR’s standard.<sup>22</sup>

#### **IV. AVRR’s Intended Use of the Alleged Easement Right Confirms That The Easement Property Was Not A Line of Railroad When AVRR Acquired Certain Assets from Conrail in 1995**

In the Notice of Exemption that AVRR filed with the ICC in 1995, AVRR unequivocally noted on the attached map that the line of railroad it was acquiring from Conrail “DEAD ENDS AT 21st STREET.”<sup>23</sup> AVRR nonetheless asserts that it was and still is holding itself out, through its tariff, to provide common carrier freight service to the public over the alleged

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<sup>22</sup> AVRR’s claim about the lack of any evidence that Conrail obtained Pennsylvania PUC grade crossing abolishment authority is not relevant here because Buncher’s property only extends to the northwest boundary of 21<sup>st</sup> Street.

<sup>23</sup> See Exhibit I to Jackovic First V.S.



easement area between 16th Street and 21st Street. However, AVRR's line of railroad starts at 21st Street and it has been serving customers in the Pittsburgh Produce Terminal area from tracks east of 21<sup>st</sup> Street. There has not been any trackage that AVRR could have used to serve customers over the disputed easement area between 16th Street and 21st Street. This entire area was abandoned by Conrail and severed from the remainder of its network in the 1980's.

AVRR's intended use of the trackage that it seeks to construct over Buncher's property confirms that it would not be used as a line of railroad subject to the Board's abandonment jurisdiction. AVRR's proposed intrastate commuter rail service would not be subject to Board jurisdiction, whether such proposed service was provided by AVRR independently or in conjunction with a public transit agency. See 49 U.S.C. § 10501(c) (Board does not have jurisdiction over mass transportation provided by a local government authority or a private entity that contracts with a local government authority to provide such service); Magner O'Hara Scenic Railway v. Interstate Commerce Commission, 692 F.2d 441 (6th Cir. 1982) (affirming ICC determination that a 262-mile intrastate passenger rail service using tracks owned by an interstate freight carrier was not service over which the ICC had jurisdiction); Fun Trains, Inc. – Operation Exemption – Lines of CSX Transportation, Inc. and Florida Department of Transportation, STB Finance Docket No. 33472 (STB served Mar. 5, 1998) (finding intrastate passenger rail service over freight railroad trackage not subject to STB jurisdiction because it would not be provided as part of the "interstate rail network").

Moreover, AVRR's proposed freight-related activities over the easement property confirm that the desired trackage would not be used as a line of railroad subject to Board jurisdiction. AVRR wants to use the property for extra "head and tail" room when it conducts switching operations on its public delivery track near 21st Street. The track would not be used to



extend AVRR's freight services into new territory or for the movement of through trains from points of shipment and delivery, as the underlying and adjacent landowner (Buncher) has made it clear that it is not interested in rail service. This ancillary switching activity is the type of operation normally conducted on excepted track under 49 U.S.C. § 10906. See Nicholson v. I.C.C., 711 F.2d 364 (D.C. Cir. 1983).<sup>24</sup>

## **V. Conclusion**

For the reasons set forth in Buncher's Reply, as supplemented by the evidence and argument in the foregoing Response to AVRR's Rebuttal, Buncher respectfully requests that the Board issue a declaratory order confirming that it has no jurisdiction over the property owned by Buncher between 16th Street and 21st Street in Pittsburgh, Pennsylvania.

Respectfully submitted,



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**ATTORNEYS FOR  
THE BUNCHER COMPANY**

Dated: June 25, 2009

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<sup>24</sup> AVRR's description of the historical use of the trackage on Buncher's property refers to loading and unloading activities on track embedded in concrete pads (which was used by trucks to drive up to the train). If the Board somehow finds that Conrail's 1984 abandonment did not apply to the former trackage on Buncher's property, the Board still must conclude that it has no jurisdiction because the alleged easement acquired by AVRR would be associated with a switching and transloading track incidental to the through movement of trains and therefore not a line of railroad.



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**VERIFIED STATEMENT OF JOSEPH M. JACKOVIC IN RESPONSE TO THE  
REBUTTAL OF ALLEGHENY VALLEY RAILROAD COMPANY**

My name is Joseph M. Jackovic and I am the Executive Vice President and General Counsel of The Buncher Company (“Buncher”). My business address is Penn Liberty Plaza I, 1300 Penn Avenue, Suite 300, Pittsburgh, PA 15222-4211. I am authorized to make this Verified Statement in Response to the Rebuttal of Allegheny Valley Railroad Company (“AVRR”) on behalf of Buncher.

In Buncher’s Reply to Allegheny Valley Railroad Company’s Petition for Declaratory Order (“Reply”), I submitted evidence that Consolidated Rail Corporation (“Conrail”) had filed for and obtained abandonment authority from the Interstate Commerce Commission (“ICC”) in 1984 pursuant to the Northeast Rail Services Act (“NERSA”) for the portion of the Valley Industrial Track that formerly existed on Buncher’s property between approximately milepost 0.3 at 16th Street and approximately milepost 0.6 at 21st Street. Conrail initiated this abandonment process under NERSA only two months after selling the relevant property to Buncher. After Conrail obtained this abandonment authority and years before Conrail’s transaction with AVRR, the trackage on Buncher’s property was removed, the entire area was filled, graded and prepared for non-railroad use and Buncher demarcated the boundaries of its property with jersey barriers, all without objection by Conrail.



AVRR claims that the Valley Industrial Track abandoned by Conrail in 1984 is different from the Valley Industrial Track that once traversed the relevant parcel of land owned by Buncher between 16th Street and 21st Street in the Strip District, despite the fact that the mileposts and endpoints described in Conrail's abandonment filing match up with the characteristics of the former trackage on Buncher's property. AVRR's claim is based solely on its interpretation of certain Exhibits attached to Conrail's 1984 abandonment filing. Given the numerous tracks that existed in that general area between 16th Street and 21st Street at the time, it is impossible to determine with any certainty what particular track is represented by the yellow line that AVRR has drawn on the abandonment map. Exhibit A attached hereto contains a map of the relevant area that was part of the 1976 deed from Penn Central Transportation Company ("PCTC") to Conrail. As shown in Exhibit A, there were numerous tracks historically in the area between 16th Street and 21st Street.

In its Preliminary System Plan from February 1975 and Final System Plan from July 1975, the U.S. Railway Association ("USRA") evaluated the lines of railroad it recommended for transfer to Conrail. Relevant pages of the USRA Preliminary and Final System Plans are attached hereto as Exhibit B. USRA used Line Numbers to evaluate the lines of railroad under consideration and Line Codes to designate the lines of railroad that it recommended for transfer to Conrail. The relevant portion of Conrail's system between 16th Street and 21st Street was included by the USRA within Line Code 2229. In the Final System Plan "Section A Rail Line Tables," Line Code 2229 is identified as part of the Allegheny Branch and contains the following three contiguous segments:

- Pittsburgh 11th Street to Pittsburgh 57th Street: MP 0.2-4.6
- Pittsburgh 57th Street to New Kensington: MP 4.6-18.6



- New Kensington to Arnold: MP 18.6-19.51

There is no reference in the Final System Plan to another, separate line of railroad (Allegheny Secondary or otherwise) extending through the area between 11th Street and 57th Street. Moreover, the 1976 Deed pursuant to which PCTC transferred Line Code 2229 to Conrail makes reference only to the “line of railroad known as the Allegheny Branch” extending from 11th Street northeast to Nadine, Oakmont and Logan’s Ferry within Allegheny County. See Exhibit C attached hereto at Deed Book Volume 6001, Page 606. The purported easement that AVRR acquired from Conrail in 1995 also makes reference to the Valley Industrial Track between milepost 0.3 and milepost 0.6 as being part of the premises identified by Line Code 2229.

The Line Numbers used by the USRA in the Preliminary and Final System Plans alternatively refer to different portions of this line of railroad on the south slope of the Allegheny River as the Allegheny Branch or the Allegheny Secondary Track. However, it is clear from the descriptions in the USRA records that these alternative references apply to a contiguous line of railroad (and associated sidings and other tracks) extending from the 11th Street area northeast to New Kensington. For example, USRA described Line No. 315 as a “Portion of Allegheny Branch” that “extends northeastward from Pittsburgh (see Line No. 650a).” USRA described Line No. 650a, which is the contiguous extension of Line No. 315, as a “Portion of the Allegheny Secondary Track.” Line No. 650a extended from the end of Line No. 315 and included the former trackage at issue between 16th Street and 21st Street. See Exhibit B at pages 408-410, 423-425. Regardless of the potential confusion over the alternating use of the terms Allegheny Branch and Allegheny Secondary, the 1976 Deed from PCTC to Conrail confirms that



all of these tracks between 16th Street and 21st Street were part of a single line of railroad referred to as the Allegheny Branch and included within Line Code 2229.

As noted above, the 1976 Deed pursuant to which PCTC transferred Line Code 2229 to Conrail refers to the line of railroad from Pittsburgh 11th Street northeast to Logan's Ferry as the Allegheny Branch. Shortly after Conrail acquired this line of railroad, it appears to have adopted the convention of referring to the segment between 16th and 21st Street as the Allegheny Secondary Track. Conrail's Track Charts from 1977 and 1983 (at the time of the Buncher conveyance and prior to the NERSA abandonment filing) refer to the section between Pittsburgh (11th) and Nadine/Red Bank as the Allegheny Secondary Track from milepost 0.0 to milepost 63.4. The charts also refer to this segment as part of Line Code 2229. See Exhibit D attached hereto. There is no reference in these charts to any separate "Allegheny Branch" trackage in the same vicinity.

Conrail's 1984 abandonment filing referred to the portion of its system between the Fort Wayne Connecting Track and 21st Street as part of the Allegheny Secondary, consistent with the earlier convention adopted by Conrail. The abandonment removed this line of railroad and associated tracks between 16th and 21st Street, and Conrail's connection with the lower level of the Fort Wayne Bridge, from Conrail's system. Subsequent maps of the Conrail system show an unmistakable gap in the rail line along the south slope of the Allegheny River in the area that formerly included Pennsylvania Railroad's 11th Street yard, 16th Street yard, and the Pittsburgh Produce Yards area up to 21st Street. These tracks were removed from Conrail's network. See, e.g., Exhibit E attached hereto, where the inset map of Pittsburgh trackage shows a gap on the line now owned by AVRR that extends out to New Kensington.



At some point between 1983 and 1994, prior to the transaction with AVRR, Conrail begins referring in its track charts to the remaining portion of the line of railroad east of 21st Street (at milepost 0.6) as the Valley Industrial Track. For example, Conrail's Track Chart from 1994 lists three separate sections of the "Valley I.T." – (i) the segment between Pittsburgh and the Junction with the Coleman Secondary (milepost 0.6 to milepost 4.7), (ii) the segment between Aspinwall and Nadine (milepost 1.8 to milepost 2.7); and (iii) the segment between Nadine and Arnold (milepost 2.7 to milepost 13.4). See Exhibit F attached hereto. The 1994 track charts do not contain any reference to AVRR's claim that the Valley Industrial Track consisted of two separate, parallel lines of railroad.

Buncher suspects that AVRR may be confusing this alleged second "Valley Industrial Track" along Smallman Street with the "Allegheny Valley Industrial Track." See Exhibit G attached hereto, which is a PCTC map from 1976 which shows that the Allegheny Valley Industrial Track ran in a general northeasterly direction in a bell curve from 16th Street towards the Allegheny River, then connecting back with the Valley Industrial Track that existed along Buncher's current property at a point between 19th Street and 20th Street. In 1978, PCTC transferred to Buncher the parcel of land which included the Allegheny Valley Industrial Track and two other tracks not relevant here. This is a different parcel of land from the rectangular property at issue in this proceeding.

The 1984 Conrail abandonment makes reference only to the Valley Industrial Track extending between 11th Street (milepost 0.0) and 21st Street (milepost 0.6). The subsequent removal of all tracks to the west of 21st Street and the complete cessation of all rail operations in this area confirms that this 1984 abandonment applied to the entirety of Conrail trackage in this area.



In the Notice of Exemption that AVRR filed with the ICC in 1995, AVRR unequivocally noted on the attached map that the line of railroad it was acquiring from Conrail “DEAD ENDS AT 21st STREET.” AVRR nonetheless asserts that it was and still is holding itself out, through its tariff, to provide common carrier freight service to the public over the alleged easement area between 16th Street and 21st Street. However, AVRR’s line of railroad starts at 21st Street and it has been serving customers in the Pittsburgh Produce Terminal area from tracks east of 21st Street. There has not been any trackage that AVRR could have used to serve customers over the disputed easement area between 16th Street and 21st Street. This entire area was abandoned by Conrail and severed from the remainder of its network in the 1980’s.

AVRR’s intended use of the trackage that it seeks to construct over Buncher’s property confirms that it would not be used as a line of railroad subject to the Board’s abandonment jurisdiction. It is my understanding that AVRR’s proposed intrastate commuter rail service would not be subject to Board jurisdiction. Moreover, AVRR’s proposed freight-related activities over the easement property confirm that the trackage would not be used as a line of railroad subject to Board jurisdiction. AVRR wants to use the property for extra “head and tail” room when it conducts switching operations on its public delivery track near 21st Street. The track would not be used to extend AVRR’s freight services into new territory or for the movement of through trains from points of shipment and delivery, as the underlying and adjacent landowner (Buncher) has made it clear that it is not interested in rail service.



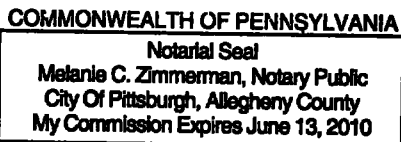
**VERIFICATION**

COMMONWEALTH OF PENNSYLVANIA     )  
                                                          )     SS:  
COUNTY OF ALLEGHENY                    )

I, Joseph M. Jackovic, Executive Vice President and General Counsel, The Buncher Company,  
swear or affirm and verify that the statements made in the foregoing Verified Statement are true  
and accurate to the best of my knowledge, information and belief.

6/23/09  
DATE

Joseph M Jackovic  
SIGNATURE



Subscribed and sworn to before me this 23<sup>rd</sup> day of June  
2009.

Melanie C. Zimmerman  
NOTARY PUBLIC



**BEFORE THE  
SURFACE TRANSPORTATION BOARD**

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Finance Docket No. 35239

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**ALLEGHENY VALLEY RAILROAD COMPANY –  
PETITION FOR DECLARATORY ORDER**

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**VERIFIED STATEMENT OF JOSEPH M. JACKOVIC IN RESPONSE TO THE  
REBUTTAL OF ALLEGHENY VALLEY RAILROAD COMPANY**

**EXHIBITS A – G**

<b>EXHIBIT</b>	<b>DESCRIPTION</b>
Exhibit A	1976 map of the historical location of various tracks in the Pittsburgh Produce Yards area
Exhibit B	USRA Preliminary System Plan and Final System Plan of 1975 (relevant pages)
Exhibit C	Deed between Conrail and PCTC dated March 30, 1976 (relevant pages)
Exhibit D	Conrail Maintenance Program and Track Chart, Central Region, Pittsburgh Division (1977 and 1983)
Exhibit E	Conrail system map circa mid-to-late 1980's
Exhibit F	Conrail Maintenance Program and Track Chart, Pittsburgh Division (1994)
Exhibit G	1976 PCTC Plan of Property of the Pittsburgh Produce Yards area showing the "Allegheny Valley Industrial Track"



## **EXHIBIT A**

**1976 Map of the Historical Location of Various Tracks in the Pittsburgh Produce Yards Area**



P.C.P. Project VOL 6001 765

10<sup>th</sup> - 21<sup>st</sup> Sts.

Bigelow Blvd. to Allegheny Riv  
Shown on following maps:

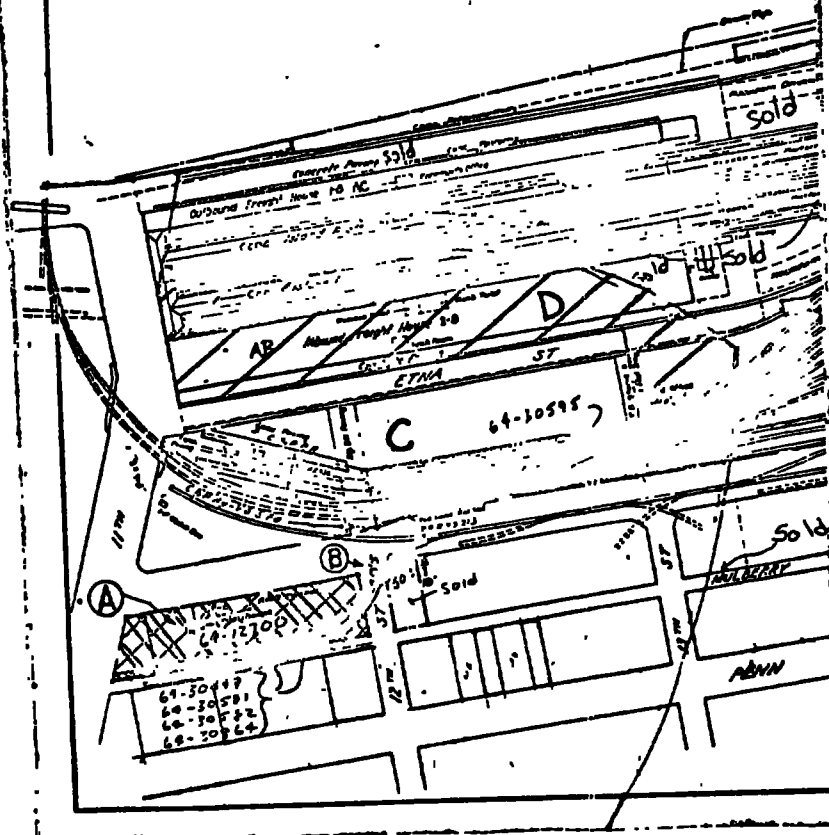
PCT { 0500-8022-2-ST18 } Also shows  
0500-8028-3-ST1

PFWIC 0500-8335-0-ST1

CIP 0060-8430-0-ST1

B.T. BAKER

ALLEGHENY RIVER



455

952

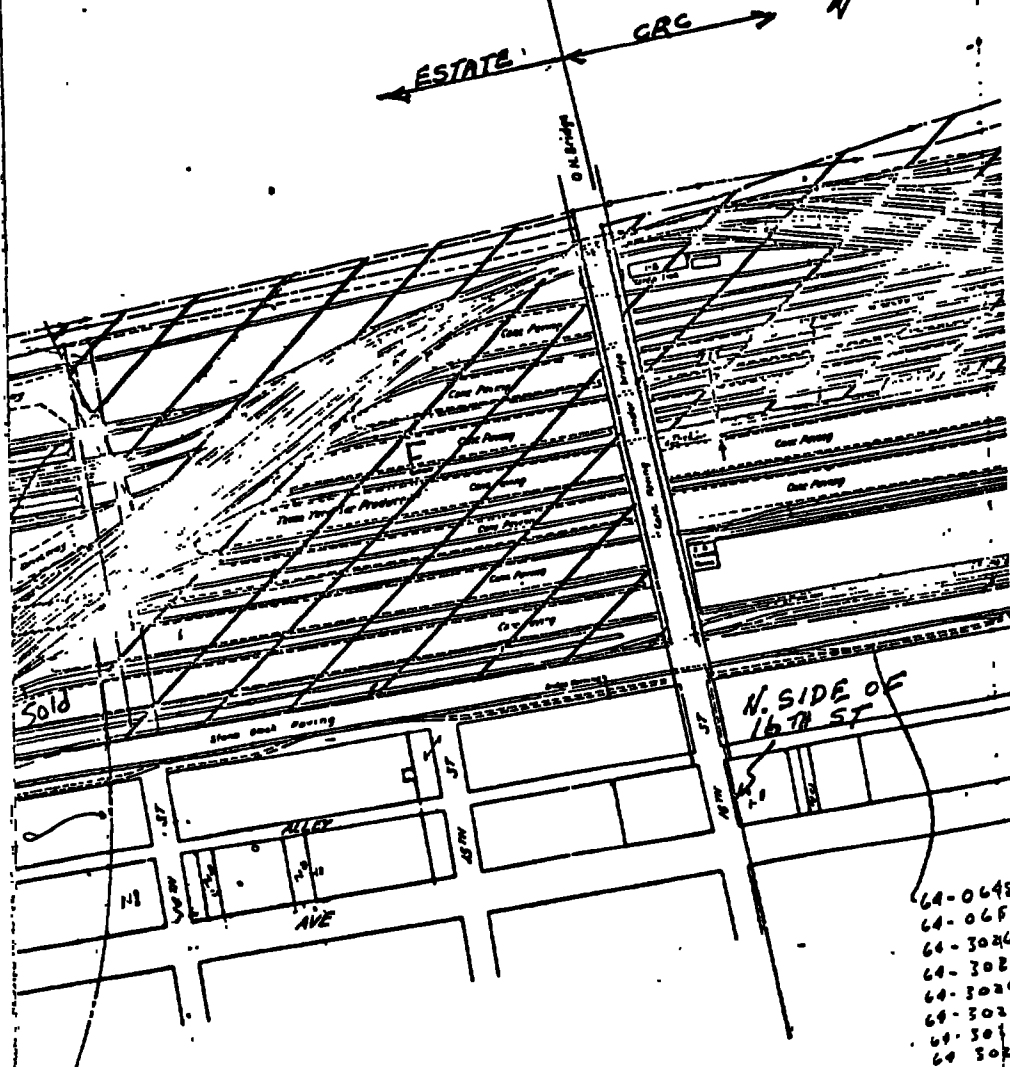
96



VOL 6001 PAGE 766

MRE properties.

A =	PAE	10E	16-5 = 32,
B =	"	"	17-7 = 919
C =	"	"	18-9 = 32,
D =	"	"	19-2 = 106
E =	"	"	20-3 =
F =	"	"	21-5 =

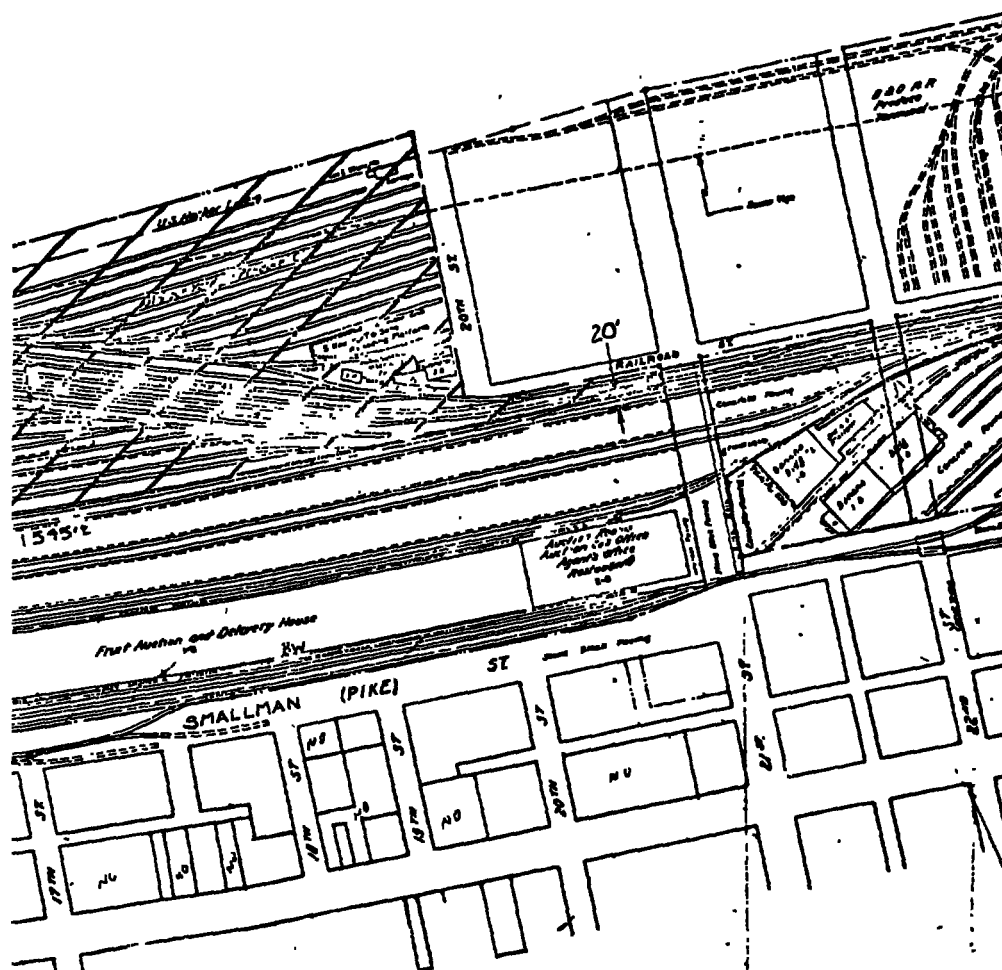




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**VOL6001 PAGE 767**

PC-CI

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2 64-30327  
-4 64-30390  
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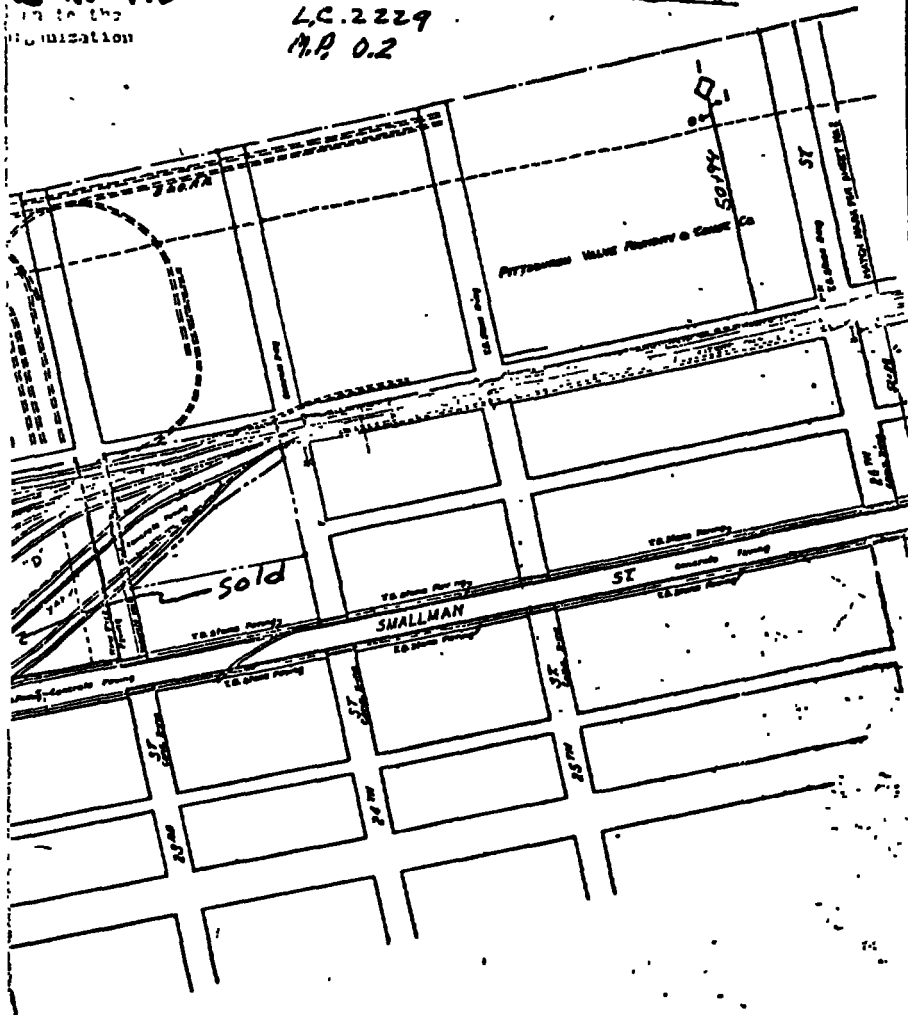
[illegible]

Correct as of Dec. 31st, 1928	40	Reynolds
Correct as of Dec. 31st, 1928	40	Reynolds
Correct as of Dec. 31st, 1927	40	Reynolds
Correct as of Jun. 30th, 1927	40	Reynolds
Correct as of Jun. 30th, 1926	40	Reynolds
Correct as of Jun. 30th, 1925	40	Reynolds
Correct as of Jun. 30th, 1924	40	Reynolds
Correct as of Jun. 30th, 1923	40	Reynolds
Correct as of Jun. 30th, 1922	40	Reynolds
Correct as of Jun. 30th, 1921	40	Reynolds
Correct as of Jun. 30th, 1920	40	Reynolds
Correct as of Jun. 30th, 1919	40	Reynolds

Correct as of Dec. 20
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Correct as of Dec. 1



LC 2229-0.2  
 VOL 6001 PAGE 758  
 OWNER 0500 VALUATION SUB SHEET  
 SECTION DIV. NUMBER REAL ESTATE  
 8028 3 ST1 REGION  
 5  
 LC-RP-173  
 L.C. 2229  
 M.P. 0.2



- 1914 Map Revised
- 1916 Map Revised
- 1918 Map Revised
- 1920 Map Revised
- 1922 Map Revised
- 1924 Map Revised
- 1926 Map Revised
- 1928 Map Revised
- 1930 Map Revised
- 1932 Map Revised
- 1934 Map Revised
- 1936 Map Revised
- 1938 Map Revised
- 1940 Map Revised
- 1942 Map Revised
- 1944 Map Revised
- 1946 Map Revised
- 1948 Map Revised
- 1950 Map Revised

**USRA LATERAL CUT LINE INCLUDED**  
 WESTERN PENNA. DIV. CONTAUGH DIV.  
 THIS TRACING IS 50% ORIGINAL  
 DRAFTSMAN TO DOUBLE SCALE  
 RIGHT OF WAY AND TRACK MAP  
**PENNSYLVANIA RAILROAD**  
 STATION 0+00 TO STATION 27+00  
 SCALE 1" = 200'  
 OFFICE OF LATERAL CUTS  
 PHILADELPHIA, PA.

21 OF 41  
 11/4  
 12/19  
 377



## **EXHIBIT B**

**USRA Preliminary System Plan and Final System Plan (relevant pages)**



V2. 3' 3' 25.8' 2.2

**PRELIMINARY SYSTEM PLAN, VOLUME I  
for restructuring  
Railroads in the Northeast and Midwest Region  
pursuant to the  
REGIONAL RAIL REORGANIZATION ACT OF 1973**

---

**February 26, 1975**



concern exists regarding the effect of rail reorganization on mass transit plans. One of the five proposed lines for this mass transit system was from Pittsburgh to New Kensington.

## Y TRACK

### Information for Line Retention Decision

Revenue received by PO. . . . . \$1, 816, 894  
Average revenue per carload. . . . . \$434

**Variable (avoidable) cost of continued services:**

Cost incurred on the branch line.....	238, 329
Cost of upgrading branch line to FRA Class I (1/10 of total upgrading cost) .....	28, 425
Cost incurred beyond the branch line .....	874, 858

**Total variable (avoidable) cost** ..... **988,507**

Net contribution (loss) total	827,257
Average per carload	108

This line would require upgrading to meet the requirements of the Federal Railroad Administration's minimum safety standards (Class I track, which has a maximum safe operating speed of 10 mph). Based on available information, this upgrading would include the replacement of a total of 8,740 crossties (an average of 996 crossties per mile).

Although service to this line generates a net contribution, service to that portion of the line from Milepost 18.6 to Milepost 28.7 generates a loss amounting to \$97,768 or \$12.967 per carload.

### Recommendation

It is recommended that the portion of the Allegheny Secondary Track from Milepost 18.1 to Milepost 18.9 be included in the ConRail System.

### Preliminary Recommendation

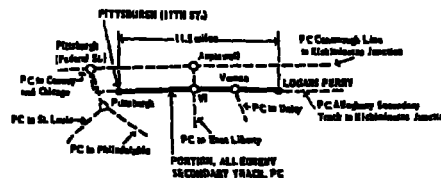
It is not recommended that the portion of the Allegheny Secondary Trunk from Milepost 12.6 to Milepost 22.7 be included in the ConRail System. Continued operation of this line would require a rail service continuation subsidy. Under 1973 traffic, revenue and cost levels, this line generates an annual excess financial burden amounting to \$97,788 or \$18,967 per carload. Recovery of costs would require approximately a one hundred fold increase in traffic or a 8,855 percent rate increase over the 1973 levels.

### PORTION OF ALLEGHENY SECONDARY TRACK

**USRA Line No. 650a**

## Penn Central

This portion of the Allegheny Secondary Track, formerly part of the Pennsylvania RR, extends from Pittsburgh (Milepost 4.6) to Logan Ferry, Pa. (Milepost 16.1), a distance of 11.5 miles, in Allegheny County, Pa.



A continuation of this line runs north to Kiskiminetas Jct. (which is also under study in this Report). At Pittsburgh, connections are made with lines diverging. This line was not described as potentially excess in the U.S. DOT Report (see Zone 78).

### Traffic and Operating Information

**Stations (with their 1978 carloads) served by this line:**

<b>Verona</b>	<b>2,804</b>
<b>Oakmont</b>	<b>2,198</b>
<b>Barking</b>	<b>3</b>

Total carloads generated by the line.....	4,700
Average carloads per week.....	91.9
Average carloads per mile.....	414.4
Average carloads per train.....	19.1

1978 operating information:

Number of round trips per year.....	250
Estimated time per round trip (hours).....	5
Locomotive horsepower.....	800
Train crew size.....	5

### Information Provided by RSPD, Shippers, Government Agencies

Information provided at the hearings conducted by the Rail Services Planning Office as reflected in their reports entitled "The Public Response to the Secretary of Transportation's Rail Service Report" indicated that future plans for mass transit would be greatly affected by the abandonment of this line. One of the five proposed routes for the mass transit system runs from Pittsburgh to New Kensington, which is just north of Logan's Ferry.

### Information for Line Retention Decision

Revenue received by PC\_\_\_\_\_ \$1, 514, 602  
Average revenue per carload\_\_\_\_\_ \$324

Variable (avoidable) cost of continued service:

Cost incurred on the branch line.....	363, 847
Cost of upgrading branch line to FRA class I (1/10 of total upgrading cost)...	28, 118
Cost incurred beyond the branch line....	847, 044

**Total variable (avoidable) cost..... 1,183,400**

Net contribution (loss): Total	411,198
Average per carload	86

This line would require upgrading to meet the requirements of the Federal Railroad Administration's minimum safety standards (Class I track, which has a maximum safe operating speed of 10 mph). Based on



available information, this upgrading would include the replacement of a total of 3,460 cross-ties (an average of 301 cross-ties per mile).

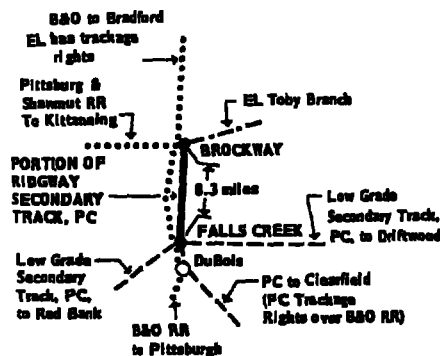
#### Recommendation

It is recommended that this portion of the Allegheny Secondary Track be included in the ConRail System.

### PORTION OF RIDGWAY SECONDARY TRACK

USRA Line No. 651

Penn Central



This portion of the Ridgway Secondary Track, formerly part of the Pennsylvania RR, extends from Brockway (Milepost 19.0) to Falls Creek, Pa. (Milepost 27.3), a distance of 8.3 miles, in Jefferson County, Pa. The Pittsburgh & Shawmut RR and the Erie Lackawanna Ry connect with this line at Brockway. This line continues south to Curwensville (via trackage rights over the B&O, which is also under study in this Report). The Low Grade Secondary Track, PC, connects at Falls Creek and runs west to Red Bank and east to Driftwood. The Baltimore & Ohio RR runs parallel to this line and continues north to Ridgway and south to Curwensville or Pittsburgh, forking near DuBois. This line was not described as potentially excess in the U.S. DOT Report (see Zone 74).

#### Traffic and Operating Information

Stations (with their 1978 carloads) served by this line:

Brockway	2
Mills	637

Total carloads generated by the line	639
Average carloads per week	12.1
Average carloads per mile	75.8
Average carloads per train	8.2

#### 1978 operating information:

Number of round trips per year	120
Estimated time per round trip (hours)	9.0

Locomotive horsepower	2,000
Train crew size	5

#### Information Provided by RSPO, Shippers, Government Agencies

No specific information concerning this line was provided at the hearings conducted by the Rail Services Planning Office as reflected in their reports entitled "The Public Response to the Secretary of Transportation's Rail Service Report."

#### Information for Line Retention Decision

Revenue received by PC	\$161,587
Average revenue per carload	\$267

#### Variable (avoidable) cost of continued service:

Cost incurred on the branch line	181,578
Cost of upgrading branch line to FRA Class I: (1/16 of total upgrading cost)	8,126
Cost incurred beyond the branch line	128,969

Total variable (avoidable) cost 288,690

Net contribution (loss): total	(107,098)
Average per carload	(170)

This line would require upgrading to meet the requirements of the Federal Railroad Administration's minimum safety standards (Class I track, which has a maximum safe operating speed of 10 mph). Based on available information, this upgrading would include the replacement of a total of 1,350 cross-ties (an average of 161 cross-ties per mile). An evaluation of coal reserves by USRA staff confirms there is an active coal loading facility (Minns Coal) on this line and traffic may increase.

#### Preliminary Recommendation

Although the preliminary recommendation is that this portion of the Ridgway Secondary Track not be included in the ConRail System, the possibility of minable coal must be explored before a final recommendation can be made. Without immediately increasing revenue, continued operation of this line would require a rail service continuation subsidy. Under 1978 traffic, revenue and cost levels, this line generates an annual excess financial burden amounting to \$107,098 or \$170 per carload. Recovery of costs would require approximately a three-fold increase in traffic or a 65 percent rate increase over the 1978 levels.

### IRVONA BRANCH

USRA Line No. 653

Penn Central

The Irvona Branch, formerly part of the Pennsylvania RR, extends from Oradon (Milepost 0.0) to Glas-



13.8 1/4 5 - 1/12

**PRELIMINARY SYSTEM PLAN, VOLUME II  
for restructuring  
Railroads in the Northeast and Midwest Region  
pursuant to the  
REGIONAL RAIL REORGANIZATION ACT OF 1973**

**February 26, 1975**



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# **VOLUME II — PART 5**

**Light-Density Lines Study  
and  
Railroad Marine Operations**

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# PENNSYLVANIA

USRA line number	Innstate Terminals
133	North Philadelphia to Queen Lane
133a	Queen Lane to Allen Lane
133b	Allen Lane to Chestnut Hill
135	Fort Washington Branch at Philadelphia
143	West Chester Branch at West Chester
173a	Phoenixville to Devault
175/176	Honey Brook to New Holland
177	Pomeroy to Doe Run
180	Cornwall to Lebanon
181	East Lebanon Branch at Lebanon
185/186	Partonville to Selinsgrove
192/192a/192b	Sunbury to Williams-Barre
192a	Hudson to Buttenwood
194	Court Street Secondary Trunk at Reading
196	Hamburg to Seluykill Haven
197	Norristown to Pottstown
197a	Pottstown to Reading
197b	Reading to Hamburg
201	Mifflinsburg to Lewisburg
202	York to Hellen
203	Mechanicsburg to Dillsburg
204	New Kingston to Chambersburg
206	Marion to Mercersburg
208	Yagartown to Readsville
209	Lewistown to Maitland
210	Fairbrook Branch at Tyrone
212/212a	Petersburg to Williamsburg
214	Martinsburg Junction to Curry
216	Bedford to Brookes Mills
218	Creek to Mount Dallas
220	Middle Canal Branch at Williamsport
243a	Mill Hill to Lock Haven
250	Corry to Titusville
252	Warren to Ridgway
253	Emporium to St. Marys
253a	St. Marys to Ridgway
254	Oil City to Tidoute
256	Polk Junction to Reno
257	Brookville Trunk at Brookville
260a	North Warren to Warren
265	McGees Secondary Trunk Near McGees
312	Fort Wayne Bridge at Pittsburgh
313	Pittsburgh to Chicago Line at Pittsburgh
314	Pittsburgh to St. Louis Line at Pittsburgh
315	Allegheny Branch at Pittsburgh
326	Black Lick Junction to Indiana
331	Hempfield Junction to Harrisburg
335	Coal Lick Run near Uniontown
344	Bridgetown to Sygna
345a	Westland Industrial Trunk
345b	Lansdown Junction to Lansdown
346a	Burgessville to Atlasburg
352	Shippingport to Kobuta

355	Scottsdale to Mount Pleasant
356	New Castle to Mercer
360	Jamestown to Leesville
361	Covanta to Walford
366	Erie to Corry
366a	Corry to Warren
367	Red Bank to Eminton
367a	Eminton to Oil City
368	Red Bank to Schenley
369	Titusville to Oil City
370	Kiskiminnus Junction to Logan Ferry
370a	Pittsburgh to Logan Ferry
371	Falls Creek to Brookway
372	Chescon to Glasgow
373	Ebensburg Junction to Black Lick
374	Black Lick to Blairsville
375	Brooke's Mills to Hollidaysburg
376	Martinsburg to Brooke's Mills
377	Lewistown to Yagartown
378	Sunbury to Thompson
379	Thompson to Mount Carmel
380	Watsonstown to Berwick
381	Columbia to Lancaster
382	Lancaster to New Holland
383	Fatshon to Conneleville
384	Houston to Washington
385	Parkburg to Lancaster
386	Lancaster to Conewago
387	Conewago to Royakton
388	At Lancaster
389	Sharon to Jamestown

## RDG

400	Chestnut Hill to Wayne Junction
401	Cheltenham Junction to Newtown
402	Lansdale to Doylestown
403	Parkman Junction to Eumans Junction
404	Eiverson to Warwick
405	Ebbrecht to Pottstown
406	Kutztown to Tipton
407	Gettysburg to Carlisle Junction
408	Rox to Lebanon
409	Sundburg to Lebanon
410	Manheim to White Oak
411	Columbia to Lancaster Junction
412	Manheim to Lancaster Junction
413	Lancaster Junction to Lancaster
414	Manheim to Little
415	Little to Shaking Spring
416	St. Clair to Bear Run Junction
417	Trevorton to Harnden
418	Lofty to Rupert
419	Rupert to West Milton
420	Tremont to Pine Grove
421	Tremont to Good Spring
422	Westwood to Tremont
423	Swatara Junction to Terminus
424	Silverton to West Junction



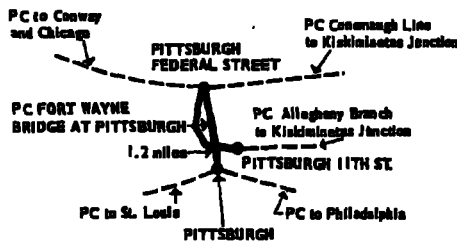
#### Recommendation

It is recommended that the McGees Secondary Track be included in the ConRail System for service to future coal traffic.

#### FORT WAYNE BRIDGE

USRA Line No. 312

Penn Central



The Fort Wayne Bridge, formerly part of the Pennsylvania RR, at Pittsburgh extends a distance of 1.2 miles, in Allegheny County, Pennsylvania. This bridge connects with the following PC lines at Pittsburgh: the Conemaugh line to Kiski Junction; the Allegheny Branch; the Pittsburgh to Philadelphia line, and the Pittsburgh to Chicago line. A portion of the Allegheny Branch is also under study in this report as potentially excess. An application to abandon this line was approved by the ICC on June 28, 1968. This line was not described as potentially excess in the U.S. DOT Report (see Zone 76).

#### Information Provided by RSPO, Shippers, Government Agencies

USRA staff have discussed with the Port Authority of Allegheny County, the proposed Urban Renewal Projects affecting this line.

#### Information for Line Retention Decision

This line is used as a route for connecting segments 314 and 318. Both of these links are not necessary for ConRail. An abandonment was previously approved as part of a local renewal project. No local shippers are dependent upon this line.

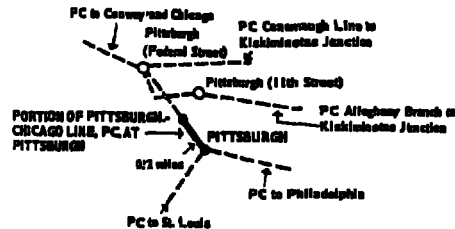
#### Preliminary Recommendation

It is not recommended that the Fort Wayne Bridge at Pittsburgh be included in the ConRail System.

#### PORTION OF PITTSBURGH-CHICAGO MAIN LINE

USRA Line No. 313

Penn Central



This portion of the Pittsburgh-Chicago Line, formerly part of the Pennsylvania RR, extends from Milepost 0.0 to Milepost 0.8, at Pittsburgh, Pa., a distance of 0.8 miles, in Allegheny County, Pa. A continuation of this line extends westward to Chicago. This line connects with the PC line to St. Louis at Pittsburgh, also under study in this Report. This line also connects with the B&O Main Line New York-Chicago and the B&O to St. Louis, at Pittsburgh. A petition for abandonment of this line was filed with the ICC (Docket Number AB5-Sub. 2). This petition is still pending final decision. This line was not described as potentially excess in the U.S. DOT Report (see Zone 76).

#### Information Provided by RSPO, Shippers, Government Agencies

Information provided at the hearings conducted by the Rail Services Planning Office as reflected in their reports entitled "The Public Response to the Secretary of Transportation's Rail Service Report" indicates that the State of Pennsylvania and the Port Authority of Allegheny County have UMTA approval to use this segment as part of the area's new rapid transit system. PC staff reports that this line is now used only for passenger service by Amtrak.

USRA staff has confirmed this testimony through meetings and correspondence with the Port Authority of Allegheny County.

#### Information for Line Retention Decision

This segment of right-of-way has been sold to the State of Pennsylvania for use in constructing a rapid transit system.

#### Preliminary Recommendation

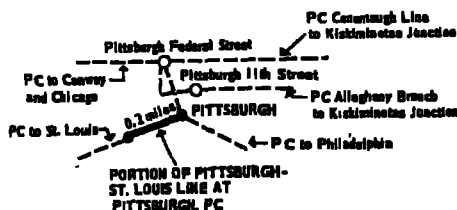
It is not recommended that this portion of the Pittsburgh to Chicago line be included in the ConRail System.



## PORTION OF PITTSBURGH-ST. LOUIS LINE

USRA Line No. 314

Penn Central



This portion of the Pittsburgh-St. Louis Line, formerly part of the Pennsylvania RR, extends from Milepost 0.0 to Milepost 0.2 at *Pittsburgh Pennsylvania*, a distance of 0.2 miles, in Allegheny County, Pa. A continuation of this line extends westward to St. Louis from Pittsburgh. This line connects with the B&O lines from New York-Chicago and St. Louis. This line also connects with the PC line to Chicago, also under study in this Report. A petition for the abandonment of this line was filed with the ICC (Docket Number AB-5, Sub. 3). This line was not described as potentially excess in the U.S. DOT Report (see Zone 76).

### Information Provided by RSPO, Shippers, Government Agencies

Information provided at the hearings conducted by the Rail Services Planning Office as reflected in their reports entitled "The Public Response to the Secretary of Transportation's Rail Service Report" indicates that the State of Pennsylvania and the Port of Authority of Allegheny County have UMTA approval to use this segment as part of the area's new rapid transit system. This line is presently used only for Amtrak service. USRA Staff has confirmed this testimony through meetings and correspondence with the Port of Authority of Allegheny County. No shippers are dependent upon this line for freight service.

### Information for Line Retention Decision

This segment of right-of-way has been sold to the State of Pennsylvania for use in constructing a highway.

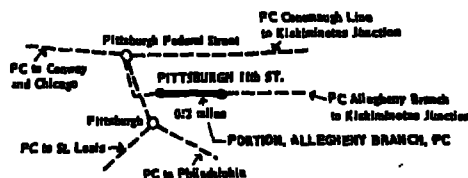
### Recommendation

It is *not* recommended that this portion of the Pittsburgh to St. Louis line be included in the ConRail System.

## ALLEGHENY BRANCH

USRA Line No. 315

Penn Central



This portion of the Allegheny Branch, formerly part of the Pennsylvania RR, at *Pittsburgh*, extends a distance of 0.2 miles, in Allegheny County, Pa. A continuation of this line extends northeastward from Pittsburgh. This line connects with the following PC lines at Fort Wayne Bridge: the Pittsburgh to Philadelphia line and the Pittsburgh to Chicago line. An abandonment application for this line was approved by the ICC on April 18, 1972, Finance Docket 26942. This line was not described as potentially excess in the U.S. DOT Report (see Zone 76).

### Information Provided by RSPO, Shippers, Government Agencies

USRA staff have discussed with the Port Authority of Allegheny County, the proposed Urban Renewal projects affecting this line.

### Information for Line Retention Decision

This line is already authorized for abandonment as part of a local Urban Renewal project. No local shippers are directly served by this line.

### Preliminary Recommendation

It is *not* recommended that this 0.2-mile portion of the Allegheny Branch be included in the ConRail System.

## PORTION OF THE INDIANA SECONDARY TRACK

USRA Line No. 326

Penn Central

This portion of the Indiana Secondary Track, formerly part of the Pennsylvania RR, extends from *Black Lick Junction* (Milepost 8.5) to *Indiana, Pa.* (Milepost 17.8), a distance of 8.8 miles, in Indiana County, Pennsylvania. This line connects with the Baltimore & Ohio to Cresskill at Indiana, and PC's Black Lick Secondary at Black Lick Junction. This line was not described as potentially excess in the U.S. DOT Report (see Zone 74).



Item 1089

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**VOLUME I (Parts I and II)**

**United States Railway Association**

**FINAL SYSTEM PLAN**

**for restructuring**

**Railroads in the Northeast and Midwest Region**

**pursuant to the**

**REGIONAL RAIL REORGANIZATION ACT OF 1973**

**JULY 26, 1975**



## SECTION A

### Designations to ConRail

The rail properties of railroads in reorganization or of railroads leased, operated or controlled by railroads in reorganization are designated for transfer to ConRail pursuant to section 206(e)(1)(A) in accordance with the *general designations* set forth below, subject to the *exceptions and additions* specified below:

#### General Designations

**Rail Lines and Trackage Rights**—The Rail Lines Table at the end of this section provides the details as to the designations of rail line and trackage right transfers to ConRail by each transferor. Rail line transfers are indicated in the "interest" column of the table as "line to CRO". Where "line to CRO" designations are made, all of the transferor's right, title and interest are transferred. Trackage right transfers are indicated in the "interest" column of the table as "TR to CRO". Under such designations only operating rights over the transferor's lines are transferred to ConRail with the balance of the right, title and interest transferred to others. In the other designations in this section, the transfer of some rail properties depends on an association with, or location along transferred rail lines. Such designations apply, except as specifically noted, only to transferred rail lines, and not to transferred trackage rights.

#### Yards—

- Transferors' interest in all freight yards associated with rail lines designated to ConRail, except for those yards offered to profitable railroads.
- Leasehold, occupancy and access rights which are necessary to the operation of present Amtrak services in all yards associated with rail lines designated to ConRail.
- An option (described in Chapter 8) to purchase or lease all or less of Transferors' remaining interest in all passenger yards associated with rail lines in which ConRail is designated an interest.

**Facilities** (including ore and coal wharves, intermodal terminals service and maintenance facilities such as shops, shop machinery, enginehouses, fuel stations and roadway buildings)—

- Transferors' interest in all freight facilities associated with rail lines or yards or portions thereof designated to ConRail, except for such facilities offered to profitable railroads.
- Leasehold, occupancy and access rights in all passenger related facilities necessary to the operation of present Amtrak services and associated with rail lines designated to ConRail.
- An option (described in Chapter 8) to purchase or lease all or less of Transferors' remaining interest in all passenger related facilities associated with rail lines in which ConRail is designated an interest.

#### Stations and Structures—

- Transferors' interest in freight related structures associated with a yard or portion thereof designated to ConRail from Transferor.
- Leasehold, occupancy and access rights necessary to the operation of present Amtrak services in stations and other passenger related structures and an option (described in Chapter 8) to acquire all or less of Transferors' remaining interest in such structures.
- Transferors' interest in those freight related structures associated with rail lines designated to ConRail which structures are used and useful in rail transportation as that term is defined in Chapter 8.
- A 2-year lease with appropriate access and occupancy rights of Transferors' interest in that portion of any structure transferred to or left with others than ConRail in which rail properties otherwise designated to ConRail are located.

**Freight Cars and Nonpassenger Service Locomotives**—Transferors' interest in all freight cars and nonpassenger service locomotives except for:

- such equipment under leases not meeting lease designation standards, and
- such equipment designated for offer to the Chessie.



**Passenger Service Locomotives**—An option (described in Chapter 8) to purchase transferors' interests in passenger service locomotives, except:

- such equipment under leases not meeting lease designation standards, and
- such equipment designated for offer to the Chessie.

**Passenger Cars**—An option (described in Chapter 8) to purchase transferors' interests in passenger cars except:

- such equipment under leases not meeting lease designation standards
- such equipment designated for offer to the Chessie.

**Work equipment**—Transferors' interest in work equipment except:

- that offered to Chessie, and
- such equipment under leases not meeting lease designation standards.

**Roadway machinery**—Transferors' interest in roadway machinery except:

- that offered to Chessie, and
- such equipment under leases not meeting lease designation standards.

**Miscellaneous equipment**—Transferors' interest in miscellaneous equipment except:

- such equipment under leases not meeting lease designation standards,
- that equipment offered to Chessie, and
- those vehicles related to continued administration of the transferor.

### Exceptions and Additions

To the extent indicated, the designations from each of the transferors whose names appear in the part of this section which follows vary from the general designations.

The following are excepted from the rail property transfers of the listed transferors:

**Yards**—Transferors' interest in only portions of the following yards are designated to ConRail, as outlined in the Final System Plan Map Compendium available at the Public Information Office of the Association:

Transferor	Yard
Connecting Railway Co.	Gropan Yard, Columbus, Ohio.
Philadelphia, Baltimore & Washington R.R. Co.	"A" and "B" Yard, Columbus, Ohio.
United New Jersey R.R. & Canal Co.	5th Street, Chicago, Ill.
Central R.R. of New Jersey	Greenville Yard, Jersey City, N.J.
	Hardman Cove Yard, Jersey City, N.J.
	E-Port Yard, Elizabeth, N.J.

Transferors' interest in all of the following yards are not designated to ConRail:

Transferor	Yard
Canada Southern Railway Co.	Victoria Yard, Ft. Erie, Ontario.
Penn. Tunnel & Terminal R.R. Co.	New Lots Yard, New York, N.Y.
Philadelphia, Baltimore & Washington R.R. Co.	Edgar Yard, Edgar, Ind.
Pittsburgh, Ft. Wayne & Chicago Railway Co.	"C" and "D" Yard, Columbus, Ohio.
Pittsburgh, Youngstown & Ashtabula Railway Co.	12th Street Yard, Chicago, Ill.
Penn. Company	Girard Yard, Girard, Ohio.
Cleveland, Cincinnati, Chicago & St. Louis Railway	Austenberg Yard, Austenberg, Ohio.
	Southport Yard, Elmira, N.Y.
	Benton Harbor Yard, Benton Harbor, Mich.

The portions transferred to ConRail of any yard transferred from the Chicago River and Indiana R.R. is limited to that needed to sustain ConRail operations.

The following additional rail properties of the transferors listed are designated for transfer to ConRail.

### Transferor

Canada Southern Railroad Co.  
Detroit River Tunnel Co.  
Niagara River Bridge Co.  
Michigan Central R.R. Co.

The rail properties in Canada owned by the Canada Southern Railroad Co., the Detroit River Tunnel Co., and the Niagara River Bridge Co. which are designated in the transfer to ConRail are subject to the following alternative designation: If it should be determined that the transfer of properties owned and located in Canada designated in the FSP cannot be effected under the Act, then the stock and leasehold interest of PCTC and Michigan Central in the Canada Southern Railroad Co. and Detroit River Tunnel Co., the leasehold interest of the Penn Central and the stock interest of Canada Southern (if permitted by law) in Niagara River Bridge Co. are designated for transfer to ConRail.

Both the lease and the alternative designations of these properties will not become effective if within 60 days of the effective date of the FSP, Penn Central, Michigan Central, and Canada Southern, as appropriate, enter into a binding agreement for sale of the Canadian properties which reserves to ConRail trucking rights which, in the judgment of USRA, would provide operating and capital costs for Con Rail similar to those under the designation and which are otherwise in accord with the needs of Con Rail.

### Mahoning Coal R.R. Co.

The transferor's interest in the Lake Erie & Eastern Railroad.

### Michigan Central Railroad

The transferor's stock interest in the following corporations:  
Detroit Terminal Railroad  
Toledo Terminal Railroad.

### Peoria & Eastern Railway Co.

The transferor's stock interest in the Peoria & Pekin Union Railway.

### St. Lawrence and Adirondack Railway Co.

The designation of the rail properties of the St. Lawrence & Adirondack Railway Co. to ConRail is subject to the following alternative designation: If it should be determined that the transfer designated in the FSP, of assets owned and located in Canada, cannot be effected under the Act, then the leasehold and stock interests of the Penn Central in the St. Lawrence and Adirondack Railway Co. are designated for transfer to ConRail.

### Indianapolis Union Railroad

The transferor's leasehold interest in the Indianapolis Belt Railroad.

### Norwich & Worcester Railroad Co.

The designation to ConRail of rail properties of the Norwich & Worcester Railroad Co. is subject to the condition that, if within 60 days of the effective date of the FSP, the Norwich & Worcester provides for continuity of operations by entry into an agreement with another railroad for sale or operation of the designated properties, the designation to ConRail will not be effective.

Both the designation to ConRail and the designation to Providence & Worcester of rail properties of the Norwich & Worcester Railroad Co. are subject to the condition that if within 60 days of the effective date of the FSP the Norwich & Worcester has presented to USRA a sound plan to operate the rail lines designated on and after conveyance date, which would maintain the same service coverage as the designations would provide, then these designations will not be effective.

### Manor Real Estate

The transferor's interests in all rail properties in Bunkayo Yard.

### Philadelphia, Baltimore & Washington Railroad Co.

Transferor's interest in the stock of the following corporations:

TRRA of Saint Louis  
Pittsburgh, Chartiers & Youghiogheny

An option (described in Chapter 8) to purchase Transferor's interest in the stock of Washington Terminal Co. An option to purchase Transferor's interest in a trust agreement relating to the Ivy City Yard (also known as the Joint Cash Yard in Washington, D.C.)

The Transferor's interest in the Wilmington Heavy Repair Shop adjacent to the Edgemoor Yard.

### Cleveland, Cincinnati, Chicago and St. Louis

The transferor's leasehold interest in the Central Railroad of Indianapolis.

### Penn Trunk Lines

The transferor's interest in all highway revenue equipment leased from Excalibur Truck Leasing Corp., subject to the lease designation standards described in Chapter 8; all trackage, terminal and other operating authorities, and an option to acquire other Penn Trunk Lines interests in other equipment and other rail property; with such authorities, and option limited, however, to those used or useful in connection with operations to be conducted by Con Rail.

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Special exceptions and additions to designations are noted with respect to the transfers whose names appear in the following part of this section.

**Transfer—Penn Central Transportation Co.**

**• road properties**

**Rail line—**

- There is designated for transfer to ConRail, an option to purchase Transferee's interest in the portion of USRA Line Code No. 484 between Elmer and Moravia as described in Project C&NW 484 in Table D-4 of Section G of this Appendix.

**Yards—**

- Transferee's interest in and rights to use the properties of Manor Real Estate in Eastgate Yard in Columbus, Ohio.
- Transferee's interest in the trust agreement relating to the Ivy City Yard (also known as the Joint Coach Yard) in Washington, D.C.
- Transferee's interest in that portion of the following yards which is outlined on yard maps in the Final System Plan Map Compendium available at the Public Information Office of the Association.

Name	Location
Washington	Washington, N.J.
8th Street	New York City, N.Y.
10th Street	New York City, N.Y.
South Boston	Boston, Mass.
Pittsford	Pittsford, Pa.
Stowley	Tulsa, Okla.
Albion	Albion, Pa.
Union	Union, N.Y.
Cedar Hill	New Haven, Conn.
Orange Yard	Columbus, Ohio.
Greenville	Greenville, N.J.
Hammond Cove	Jersey City, N.J.
6th Street	Chicago, Ill.
"A"-B	Columbus, Ohio.

- Transferee's interests in the following yards are not designated for transfer to ConRail:

Name	Location
Deak Junction	Edin, Pa.
Bethlehem	Wilkes-Barre, Pa.
Mahoning	Mahoning, N.Y.
Newburgh	Newburgh, N.Y.
Southport	Southport, N.Y.
New Lots	New York City, N.Y.
Newport	Newport, R.I.
Elmer	Elmer, Ind.
Vienna	Fort Erie, Ontario.
Port	New London, Conn.
Pittsfield	Pittsfield, Conn.
New Kensington	New Kensington, Pa.
Grand	Grand, Ohio.
Tulsa	Tulsa, Okla.
O-D Yard	Columbus, Ohio.
Austintown	Austintown, Ohio.
W. Columbus	Columbus, Ohio.
10th Street	Chicago, Ill.
John	John, Ill.
Boston Harbor	Boston Harbor, Mass.
Pittsfield	Pittsfield, Conn.
Yard Avenue	Boston, Mass.
Milway	New London, Conn.
E. Boston	Boston, Mass.
Lowell	Lowell, Mass.

**Marine Terminal Facilities**—Transferee's interest in the marine terminal facility at Greenville Yard, Jersey City, N.J. is designated for transfer to ConRail.

**Facilities** (including shops, shop machinery, enginehouses, fuel stations and roadway buildings and service and maintenance facilities) not otherwise designated to Amtrak or transportation authorities.

- Transferee's interest in the engine service facility at Three Rivers, Mich. is not designated for transfer to ConRail.

- Transferee's interest in the Wilmington Heavy Repair Shop adjacent to the Edgewater yard (which is offered to the Southern) is designated for transfer to ConRail.

**Intermodal Terminals**—Transferee's interest in the Port Newark Intermodal terminal at Newark, N.J., is not designated for transfer to ConRail.

**Rail Wading Facilities**—Transferee's interest in all rail wading facilities is designated for transfer to ConRail.

**Stations and other structures not otherwise designated to Amtrak or transportation authorities—**

- There is designated for transfer to ConRail such leasehold, occupancy and easement rights in the Providence Union Station and the terminal agreement relating thereto as are necessary to the operation of present passenger service, and an option to purchase, lease or otherwise acquire all or less of transferee's remaining interest.
- Such leasehold, occupancy and easement rights in transferee's interest in passenger stations and other structures associated with all lines in the Northeast Corridor which are necessary to the operation of present passenger service and an option (described in Chapter 3) to purchase, lease, or otherwise acquire the remainder or less of transferee's interest.

**• equipment**

Type	Identification Number	Finance Method	Agreement Number
MU-Electric	800-825	Lease	728
"	807-825	"	728
"	850-825	"	728
"	850-825	"	728
"	850-825	"	728

**Passenger Cars**—There is designated for transfer to ConRail the option described in Chapter 3, to purchase the transferee's interest in all passenger cars, except:

**Nonpassenger service locomotives**—There is designated for transfer to ConRail an option to purchase Transferee's interest in the following locomotives which were manufactured and are operated in Canada:

Type	Identification No.
EMD GP-9	5225-5227
EMD GP-9	7425-7428

**Freight cars**—Transferee's interests in the following freight cars are not designated for transfer to ConRail.

Type	No. of Units	Identification Number	Finance Method	Agreement Number
Flat TOFO	100	008700-008700	Lease	575
Flat TOFO	100	008800-008800	Lease	575
Flat TOFO	100	008900-008900	Lease	575
Flat TOFO	100	009000-009000	Lease	575
Flat TOFO	100	009100-009100	Lease	575
Flat TOFO	100	009200-009200	Lease	575
Flat TOFO	100	009300-009300	Lease	575
Flat TOFO	100	009400-009400	Lease	575
Flat TOFO	100	009500-009500	Lease	575

**Floting equipment**—An option (described in Chapter 3), to purchase all or part of transferee's interest in the following floating equipment:

Type	Name or Identification Number	Number of Units
1920 Tug Boat	Cincinnati	1
1920 Tug Boat	New York	1
1920 Tug Boat	Harrisburg	1
1920 Tug Boat	Pittsburgh	1
1920 Car Float	70	1
1927 Car Float	78	1
1928 Car Float	80-84	5
1944 Car Float	140	1
1944 Car Float	145-148	4
1945 Car Float	150	1

**Highway revenue equipment—**

- Transferee's interest in all highway revenue equipment owned by transferee;
- Transferee's leasehold interest in highway revenue equipment leased from Transferee Truck Leasing except such equipment under leases not meeting lease designation standards; and
- Transferee's leasehold interest in highway revenue equipment leased from Pennsylvania Truck Leasing.



### Transferor--Penn Central Transportation Co.—Con.

- **materials and supplies**
  - Transferor's interest in materials and supplies in the stationary storehouse in Cleveland, Ohio are designated for transfer to Con Rail.
- **administrative assets**
  - Transferor's leasehold interest in the following buildings is designated for transfer to Con Rail.
    - 6 Penn Center Plaza, Philadelphia, Pa.
    - 15 N 32nd Street, Philadelphia, Pa.
    - 81 East Georgia St., Indianapolis, Ind.
- **other**
  - Stock—**
    - Transferor's stock interest in the following corporations:
      - Bolt Railway Co. of Chicago
      - Illinois Terminal Railroad
      - Penn & Pktn Union Railway
      - Detroit Terminal Railroad
      - Toledo Terminal Railroad
      - Indiana Harbor Bolt Railroad
      - Columbus Western Railroad
      - Akron & Barberton Bolt Railroad
      - Memphis Railway
      - Trailer Train Company
      - Fruit Growers Express Co.
  - An option (described in Chapter 5) to purchase transferor's interest in the stock of the following corporations:
    - Lakefront Dock & Railroad Terminal Company
    - Richmond-Washington Co.

**Note:** The rail properties in Canada owned by the Canada Southern Railroad Company, the Detroit River Tunnel Company, and the Niagara River Bridge Company which are designated in the Con Rail are subject to the following alternative designation: If it should be determined that the transfer of properties owned and located in Canada designated in the FSP cannot be effected under the Act, then the stock and leasehold interest of FCTC and Michigan Central in the Canada Southern Railroad Company and Detroit River Tunnel Company, the leasehold interest of the Penn Central and the stock interest of Canada Southern (if permitted by law) in Niagara River Bridge Company are designated for transfer to Con Rail. Both the basic and the alternative designations of these properties will not become effective if within 60 days of the effective date of the FSP, Penn Central, Michigan Central, and Canada Southern, as appropriate, enter into a binding agreement for sale of the Canadian properties which reserves to Con Rail trackage rights which, in the judgment of USRA, would provide operating and capital costs for Con Rail similar to those under the designation and which are otherwise in accord with the needs of Con Rail.

- Trackage rights reserved by transferor for operating freight and passenger service over the rail properties sold in the Commonwealth of Massachusetts and MBTA.
- Trackage rights reserved by transferor for freight and passenger service under the West End Agreement with the Connecticut Transportation Authority and Metropolitan Transportation Authority.
- Trackage rights reserved by transferor for freight and passenger operations under the Hudson/Harlem lease agreement.
- All other trackage rights reserved by transferor and currently used by it in its operations over lines sold or leased by it to public authorities.
- Trackage rights in the transferor's leasehold interest in three specific line segments of the New York and Harlem Railroad Company as indicated in the Rail Line Table.
- Transferor's leasehold interest in the following railroads:
  - Amsterdam, Chathamunda and Northern Railroad,
  - Central Railroad of Indianapolis.
- Transferor's leasehold and stock interest in the St. Lawrence & Adirondack Railway Company are designated for transfer to Con Rail only if it should be determined that the transfer of Canadian rail properties of the St. Lawrence & Adirondack Railway Company to Con Rail as designated in the FSP cannot be effected under the Act.

### Transferor—Reading Company

#### • equipment

There is designated for transfer to Con Rail:

Nonpassenger service locomotives—Transferor's interest in the following nonpassenger service locomotives:

Type	No. of Units	Identification No.	Finance Method	Finance No.
GP7.....	1	620	Unencumbered...	
GP7.....	1	621	"	
GP7.....	1	622	"	
GP7.....	1	624	"	
GP7.....	12	625-636	"	
GP7.....	1	639	"	

#### Freight cars—

- Transferor's interest in approximately 1,100 hopper cars currently under construction.

#### • materials and supplies

There is designated for transfer to Con Rail transferor's passenger related materials and supplies in Reading, Pa.

#### • administrative assets

There is designated for transfer to Con Rail transferor's interest in the Reading Terminal at Reading, Pa. with an allocation of appropriate office space to Con Rail necessary for operations, subject to payment of appropriate rental to Con Rail.

### Transferor—Lahigh Valley Railroad

#### • road properties

##### Yards—

- There is designated for transfer to Con Rail Transferor's interest in that portion of the following yards which is outlined on yard maps in the Final System Plan Map Compendium available at the Public Information Office of the Association:

Name	Location
Jersey City.....	Jersey City, N.J.
Bayre.....	Bayre, Pa.

- No interest in the following yards is designated for transfer to Con Rail:

Name	Location
Jim Thorpe.....	Jim Thorpe, Pa.
E. Clarendon.....	Jersey City, N.J.
Geneva.....	Geneva, N.Y.
Rochester.....	Rochester, N.Y.
E. Buffalo.....	Buffalo, N.Y.
Suspension Bridge.....	Niagara Falls, N.Y.
Manchester.....	Manchester, N.Y.

### Transferor—Central Railroad of New Jersey

#### • road properties

- Yards—There is designated for transfer to Con Rail Transferor's interest in only that portion of the following yard which is outlined on yard maps in the Final System Plan Map Compendium available at the Public Information Office of the Association:

Name	Location
E-Port.....	Elizabeth, N.J.

### Transferor—Erie Lackawanna

#### • road properties

- Yards—There is designated for transfer to Con Rail Transferor's interest in the 51st St. Yard in Chicago, Ill.

#### • materials and supplies

There is designated for transfer to Con Rail Transferor's interest in passenger related materials and supplies at Hoboken, N.J.

#### • administrative assets

There is designated for transfer to Con Rail Transferor's interest in the Hoboken Terminal at Hoboken, N.J. with an allocation of appropriate office space to Con Rail necessary for operations, subject to payment of appropriate rental to Con Rail.

#### • other

- Stock—Transferor's stock interest and operating agreement in Chicago & Western Indiana.



## Section A Rail Line Tables

[illegible]



**INTERESTS DESIGNATED TO COUNCIL**

LINE	CP22	PRIO	STATION	TC	STATION	RPI	RPT	SAFEC	SAFEC	STATION	STATION
TRANSFER: ST. LOUIS & BIRMINGHAM ST. CO.											
1790	100	100	100	10.3	17.9	10.3	17.9	10.3	17.9	10.3	17.9
1790	100	100	100	17.9	10.3	17.9	10.3	17.9	10.3	17.9	10.3
TRANSFER: SHARON VALLEY & POTTSMOUTH R. CO.											
1307	100	100	100	0.0	0.2	0.0	0.2	0.0	0.2	0.0	0.2
1307	100	100	100	12.0	10.2	12.0	10.2	12.0	10.2	12.0	10.2
1307	100	100	100	21.0	24.0	21.0	24.0	21.0	24.0	21.0	24.0
TRANSFER: TROY & CONCORDIA R. R. CO.											
1375	100	100	100	0.0	5.7	0.0	5.7	0.0	5.7	0.0	5.7
TRANSFER: UNION R. R. CO. OF ALABAMA											
1360	100	100	100	0.0	3.3	0.0	3.3	0.0	3.3	0.0	3.3
TRANSFER: UNITED R. R. & CANAL CO.											
1120	100	100	100	0.3	1.4	0.3	1.4	0.3	1.4	0.3	1.4
1120	100	100	100	1.4	34.4	1.4	34.4	1.4	34.4	1.4	34.4
1120	100	100	100	34.4	20.7	34.4	20.7	34.4	20.7	34.4	20.7
1120	100	100	100	50.7	64.3	50.7	64.3	50.7	64.3	50.7	64.3
1120	100	100	100	64.3	45.3	64.3	45.3	64.3	45.3	64.3	45.3
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Rem 1087

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**VOLUME II (Part III)**

**United States Railway Association  
FINAL SYSTEM PLAN  
for restructuring  
Railroads in the Northeast and Midwest Region  
pursuant to the  
REGIONAL RAIL REORGANIZATION ACT OF 1973**

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**JULY 26, 1975**

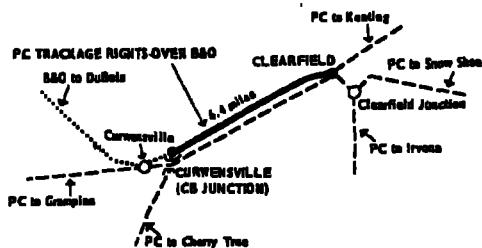
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**TRACKAGE RIGHTS OVER B&O**

**USRA Line No. 264**

**Penn Central**



These trackage rights over the Baltimore & Ohio RR extend from *Curwensville (CB Junction)* (Milepost 19.3), to *Clearfield, Pa.* (Milepost 25.7), a distance of *6.4 miles*, in Clearfield County, Pa.

This line is a part of the through PC line from Clearfield to the Cherry Tree coal district. At Clearfield it connects with the Snow Shoe Branch and the WBV Branch to Keating, both PC. At Clearfield, it connects with the PC line to Grampian which runs in the same valley, and the PC Madera Branch. The B&O continues northwestward from Curwensville to DuBois.

**Information for Line-Transfer Decision**

These trackage rights are required for the movement of unit coal trains.

**Disposition**

Trackage rights over this portion of the B&O shall be transferred to the Consolidated Rail Corp.

**PORTRION OF McGEES SECONDARY TRACK**

**USRA Line No. 295**

**Penn Central**

This portion of McGees Secondary Track, extending from *McGees* (Milepost 41.0) to *Glen Campbell, Pa.* (Milepost 48.7), a distance of *7.7 miles*, in Clearfield and Indiana Counties, Pa., a line which was recommended for inclusion on page 743 of the Preliminary System Plan, shall be transferred to the Consolidated Rail Corp.

**FORT WAYNE BRIDGE**

**USRA Line No. 312**

**Penn Central**



The Fort Wayne Bridge, formerly part of the Pennsylvania RR, extends from VS5959+07 to VS5969+97, from VS7+88 to VS87+44, from VS5+65 to VS15+85 and from VS15+85 to VS87+44, a distance of *1.2 miles* at Pittsburgh, Pa. in Allegheny County, Pa. This bridge connects with the following PC lines at Pittsburgh: the Conemaugh line to Kiskiminetus Junction, the Allegheny Branch (see Line No. 315), the Pittsburgh-to-Philadelphia line and the Pittsburgh-to-Chicago line (see Line No. 313). The Allegheny Branch uses the lower level of this bridge, while the Pittsburgh-Chicago line is on the upper level.

**Public Comments on Preliminary System Plan**

Testimony was for USRA Line Nos. 312 and 315 collectively.

The City of Pittsburgh and the Commonwealth of Pennsylvania oppose abandonment because the proposed alternative routing for main line freight is over a more circuitous northerly route. This routing avoids the southwestern corner of Pennsylvania so that service to the area would be reduced and jobs at Conway Yard would be lost.

The Port Authority of Allegheny County supports abandonment, stating that some of the area's important public improvements have been delayed for years pending the abandonment and removal of these segments.

Numerous citizens and groups such as the League of Women Voters, who favor mass transit and intercity rail passenger service spoke for or against the proposal.

The Pennsylvania PUC maintains that the bridge will sever the PC main line between New York and Chicago and require unfavorable rerouting of about 12,000 trains, including passenger trains, per year.

USRA says that no local shippers depend on the line; however, at least two shippers voiced reservations about what this proposal would do to their service.



Papercraft generates more than 2,250 cars at Pittsburgh annually. A shift of main line traffic to the Conemaugh Division main line will increase greatly the number of trains operating on this line. Papercraft is concerned that its need to shift, load, and unload traffic daily will be given lower priority for track use than through passenger and freight trains.

Nabisco received approximately 1,200 cars of flour last year, most of it in jumbo hoppers. It anticipates that the abandonment will cause greater use of the Brilliant Bridge and trusts that the necessary strengthening of this bridge has been accomplished before the added traffic creates an intolerable situation.

The City claims that several businesses in the Strip District representing approximately 100 car-loads per year would be without service and that rail users from downtown Pittsburgh eastbound to and including Wilkinsburg, Homewood, Edgewood and Swissvale would be adversely affected.

#### Information for Line-Transfer Decision

A reevaluation of this bridge determined that it is required for the movement of through trains.

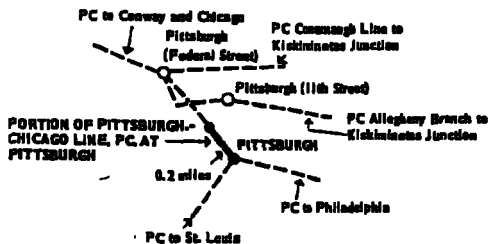
#### Disposition

The Fort Wayne Bridge shall be transferred to the Consolidated Rail Corp.

#### PORTION OF PITTSBURGH-CHICAGO LINE

##### USRA Line No. 313

##### Penn Central



This portion of the Pittsburgh-Chicago line, formerly part of the Pennsylvania RR, extends from Milepost 0.0 to Milepost 0.2, at Pittsburgh, Pa., a distance of 0.2 miles, in Allegheny County, Pa. A continuation of this line extends westward to Chicago (see Line No. 312). This line connects with the PC line to St. Louis at Pittsburgh (see Line No. 314). Pittsburgh is also served by the B&O main line Philadelphia-Chicago and the B&O to Cincinnati.

#### Public Comments on Preliminary System Plan

The position of the City, state, Port Authority and public witnesses are identical to that set out in the comment on Line 312.

Pennsylvania DOT says the segment is the passenger station used by four Amtrak and 20 freight trains passing through to Line 312 daily.

#### Information for Line-Transfer Decision

A reevaluation of this line determined that it is required for the movement of through freight trains.

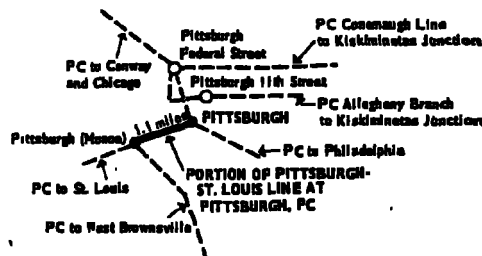
#### Disposition

This portion of the Pittsburgh-to-Chicago line shall be transferred to the Consolidated Rail Corp. There is disagreement as to whether Penn Central or the Commonwealth of Pennsylvania actually owns this property. In the event that the Commonwealth is found to be the rightful owner, they have agreed to lease to ConRail, on reasonable terms, two or more running tracks on this portion of Pittsburgh-to-Chicago line.

#### PORTION OF PITTSBURGH-ST. LOUIS LINE

##### USRA Line No. 314

##### Penn Central



This portion of the Pittsburgh-St. Louis line, formerly part of the Pennsylvania RR, extends from the passenger depot (Milepost 0.0) to the southwest end of the Panhandle Bridge (Milepost 1.1), a distance of 1.1 miles at Pittsburgh, Pa., in Allegheny County, Pa. A continuation of this line extends westward to St. Louis from Pittsburgh. Pittsburgh is also served by B&O lines Philadelphia-Chicago and Pittsburgh-Cincinnati. This line also connects with the PC line to Chicago (see Line No. 312) and New York.

#### Public Comments on Preliminary System Plan

Position of the city, state, port authority and public witnesses are the same as has been noted in the comments on Line No. 312.



**PENNSYLVANIA**  
**315, 326**

410

**Information for Line-Transfer Decision**

This line does not serve directly any shippers and is not required for through trains.

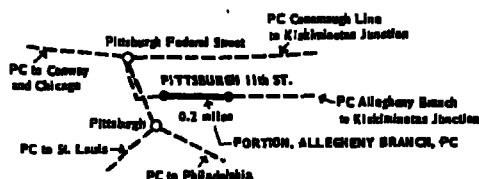
**Disposition**

This portion of the Pittsburgh-to-St. Louis line is not designated for transfer to Consolidated Rail Corp. and is available for subsidy pursuant to section 304 of the Act. Public officials have recommended that certain rail rights-of-way be used for other public purposes if rail service is discontinued. For line-specific recommendations, see section C of this appendix.

**PORTION OF ALLEGHENY BRANCH**

**USRA Line No. 315**

**Penn Central**



This portion of the Allegheny Branch, formerly part of the Pennsylvania RR, extends a distance of 0.2 miles at Pittsburgh, in Allegheny County, Pa. A continuation of this line extends northeastward from Pittsburgh (see Line No. 650a). In the other direction, the line goes across the lower level of the Fort Wayne Bridge to Pittsburgh (Federal Street) (see Line No. 312).

**Public Comments on Preliminary System Plan**

Position of the City, State, Port Authority and public witnesses is treated in the comments for Line No. 312.

Pennsylvania PUC asserts that this line's primary value is in conjunction with the Fort Wayne Bridge route (Line No. 312). It provides a much shorter route to the many shippers along the Allegheny Branch and it may be desirable to retain it for this reason.

**Information for Line-Transfer Decision**

This line was reevaluated and is not necessary for through trains and does not serve directly any local shippers.

**Disposition**

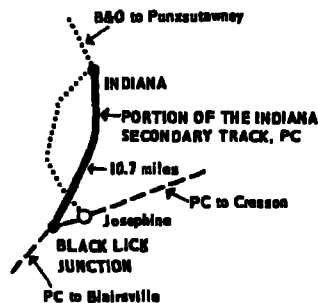
This portion of the Allegheny Branch is not designated for transfer to Consolidated Rail Corp. and is available for subsidy pursuant to section 304 of the Act.

Public officials have recommended that certain rail rights-of-way be used for other public purposes if rail service is discontinued. For line-specific recommendations, see section C of this appendix.

**PORTION OF THE INDIANA SECONDARY TRACK**

**USRA Line No. 326**

**Penn Central**



This portion of the Indiana Secondary Track, formerly part of the Pennsylvania RR, extends from Black Lick Junction (Milepost 7.3) to Indiana, Pa. (Milepost 18.0), a distance of 10.7 miles, in Indiana County, Pa. At Black Lick Junction the line continues south to Blairsville (see Line No. 655a). The line connects with the Baltimore & Ohio to Punxsutawney at Indiana, and PC's Black Lick Secondary Track at Black Lick Junction (see Line No. 655).

**Traffic and Operating Information**

Stations (with their 1973 carloads) served by this line:

Graceton	0
Homer City	18
Indiana	288

Total carloads generated by the line	306
Average carloads per week	5.9
Average carloads per mile	28.9
Average carloads per train	7.7

**1973 operating information:**

Number of round trips per year	40
Estimated time per round trip (hours)	2.0
Locomotive horsepower	2,000
Train crew size	4

**Public Comments on Preliminary System Plan**

Indiana County Planning Commission objects to the proposed abandonment. It disagrees with USRA's statement that the area's coal reserves can be served from adjacent Line No. 327, since this line is listed as recently abandoned.



that smaller crews and lower horsepower units are being used on USRA Line Nos. 647a, 649 and 650.

PPG Industries' plant in Ford City received 67 carloads in 1973 and 22 in 1974.

Harbison-Walker Refractories at Templeton says its records show that Templeton generated 495 cars in 1973 and 549 in 1974. It questions other data used by USRA such as the number of switches, crew size and locomotive horsepower.

Allegheny Sand, Inc., in Godfrey ships more than 15,000 tons of sand and scrap primarily to steel mills within a 300 mile radius. The loss of rail service would damage the company irreparably because the cost of trucking sand is prohibitive.

#### Information for Line-Transfer Decision

Revenue received by PC	\$892,320
Average revenue per carload	\$371
Variable (avoidable) cost of continued service:	
Cost incurred on the branch line	509,514
Cost of upgrading branch line to FRA Class I: (1/10 of total upgrading cost)	22,914
Cost incurred beyond the branch line	541,898
Total variable (avoidable) cost	1,074,324
Net contribution (loss): total	(182,004)
Average per carload	(75)

This line would require upgrading to meet the requirements of the Federal Railroad Administration's minimum safety standards (Class I track, which has a maximum safe operating speed of 10 m.p.h.). Based on available information, this upgrading would include the replacement of a total of 800 cross-ties.

The need for this line as an overhead route was re-evaluated by the Association's Office of Operations Planning. Due to the existence of alternative routes, through trains will not use this line. The LEF&C will have alternate routing available.

Although service to the entire line generates a loss, service to that portion of the line from Milepost 29.3 to Milepost 53.5 (serving shippers at Godfrey, Ford City, Kittanning and Templeton who generated 2,405 carloads in 1973) would generate \$592,504 in revenue and \$882,155 in costs with a resulting contribution of \$10,349.

Service to the remainder of the line (from Milepost 53.5 to Milepost 63.5 serving shippers at Rimerton who generated 1 carload in 1973) would generate \$416 in revenue and \$80,019 in costs with a resulting loss of \$79,603. Recovery of costs would require approximately a five-hundred-nineteenfold increase in traffic or a 19,125-percent rate increase over the 1973 levels.

#### Disposition

The portion of the Allegheny Secondary Track from Milepost 29.3 to Milepost 53.5 shall be transferred to the Consolidated Rail Corp.

The portion of the Allegheny Secondary Track from Milepost 53.5 to Milepost 63.5 is not designated for transfer to Consolidated Rail Corp. and is available for subsidy pursuant to section 804 of the Act. Public officials have recommended that certain rail rights-of-way be used for other public purposes if rail service is discontinued. For line-specific recommendations, see section C of this appendix.

#### PORTION OF THE TITUS SECONDARY TRACK

USRA Line No. 649

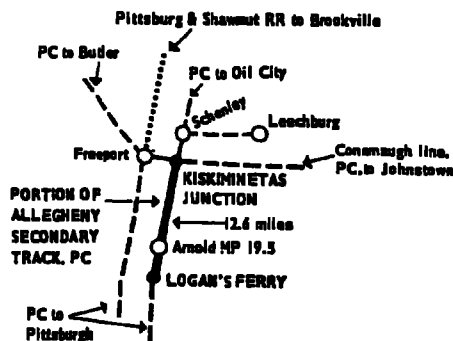
Penn Central

This portion of the Titus Secondary Track, extending from Titusville (Milepost 119.9) to Oil City, Pa. (Milepost 137.0), a distance of 17.1 miles, in Crawford and Venango Counties, Pa., a line which was recommended for inclusion on page 758 of the Preliminary System Plan, shall be transferred to the Consolidated Rail Corp. It is recommended that the Chessie system provide the local freight service to this line (see section 206(g) of the Act). If such service cannot be arranged, ConRail will serve the line via trackage rights over the Chessie system (EL tracks), or ConRail will provide the local service and interchange with the Chessie at Oil City.

#### PORTION OF ALLEGHENY SECONDARY TRACK

USRA Line No. 650

Penn Central





# PENNSYLVANIA 650a

424

This portion of the Allegheny Secondary Track, formerly part of the Pennsylvania RR, extends from *Logan's Ferry* (Milepost 16.1) to *Kiskiminetas Junction, Pa.* (Milepost 28.7), a distance of 12.6 miles, in Westmoreland and Allegheny Counties, Pa. Continuations of this line run north to Schenley and south to Pittsburgh (see Line No. 650a). This line also connects with the Conemaugh line, PC, at Kiskiminetas Junction.

## Traffic and Operating Information

Stations (with their 1978 carloads) served by this line:

Logan's Ferry	484
Parnassus	0
New Kensington	2,573
Braeburn	7

Total carloads generated by the line	3,058
Average carloads per week	58.8
Average carloads per mile	242.1
Average carloads per train	12.3

## 1978 operating information:

Number of round trips per year	250
Estimated time per round trip (hours)	11
Locomotive horsepower	1,000
Train crew size	4

\* Includes only traffic on segment.

## Public Comments on Preliminary System Plan

Standard Terminal, Inc., is located in Arnold at Milepost 19.3. USRA recommends that only the portion of the line between Mileposts 16.1 and 18.6 be included. Standard believes it should continue to receive service at Arnold and that there is confusion because the traffic it generates at Arnold is consigned to it at New Kensington, where it has another facility. PC serves Arnold from its New Kensington yard. In 1974 Standard received 1,721 cars (150,000 tons) and shipped 184 cars (11,000 tons). Standard requests that USRA extend the portion of this line to be included by 1.4 miles to Milepost 20.0.

There is an industrial park 0.7 of a mile north of Milepost 18.6 which will be left without service if the line is discontinued. Westmoreland County urges extension of the line to serve this industrial development.

## Information for Line-Transfer Decision

Revenue received by PC	\$1,329,181
Average revenue per carload	\$434

## Variable (avoidable) cost of continued services:

Cost incurred on the branch line	282,770
Cost of upgrading branch line to FRA Class I (1/10 of total upgrading cost)	26,428
Cost incurred beyond the branch line	688,088
Total variable (avoidable) cost	1,000,284
Net contribution (loss): total	328,897
Average per carload	107

This line would require upgrading to meet the requirements of the Federal Railroad Administration's minimum safety standards (Class I track, which has a maximum safe operating speed of 10 m.p.h.). Based on available information, this upgrading would include the replacement of a total of 3,740 cross-ties (an average of 296 cross-ties per mile).

Testimony from Standard Terminal indicated the milepost at New Kensington should have been 19.5. This was verified and the portion of the line to receive continued rail service has been lengthened.

Although service to the entire line generates a contribution, service to that portion of the line from Milepost 16.1 to Milepost 19.5 (serving shippers at Logan's Ferry and New Kensington who generated 3,058 carloads in 1978) would generate \$1,327,461 in revenue and \$890,392 in costs with a resulting contribution of \$457,068.

Service to the remainder of the line (from Milepost 19.5 to Milepost 28.7 serving shippers at Braeburn who generated 7 carloads in 1978) would generate \$1,730 in revenue and \$90,915 in costs with a resulting loss of \$89,185. Recovery of costs would require approximately a ninety-sevenfold increase in traffic or a 518-percent rate increase over the 1978 levels.

At the request of OSPD, this line was reviewed for through freight service. Operations Planning at USRA determined that through freight could move via alternate routes.

## Disposition

The portion of the Allegheny Secondary Track from Milepost 16.1 to Milepost 19.5 shall be transferred to the Consolidated Rail Corp.

The portion of the Allegheny Secondary Track from Milepost 19.5 to Milepost 28.7 is not designated for transfer to Consolidated Rail Corp. and is available for subsidy pursuant to section 304 of the Act. Public officials have recommended that certain rail rights-of-way be used for other public purposes if rail service is discontinued. For line-specific recommendations, see section C of this appendix.

## PORTION OF ALLEGHENY SECONDARY TRACK

USRA Line No. 650a

Penn Central

This portion of the Allegheny Secondary Track, extending from *Pittsburgh (11th Street)* (Milepost 4.6) to *Logan's Ferry, Pa.* (Milepost 16.1), a distance of 11.5 miles, in Allegheny County, Pa., a line which was recommended for inclusion on page 760 of the Preliminary

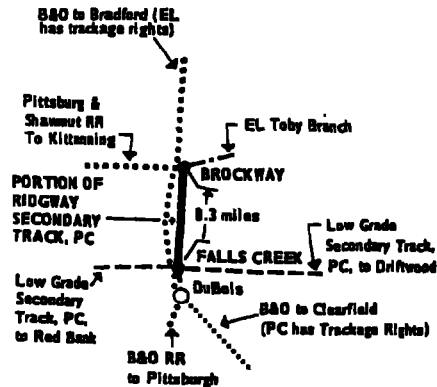


System Plan, shall be transferred to the Consolidated Rail Corp.

### RIDGWAY SECONDARY TRACK

USRA Line No. 651

Penn Central



The Ridgway Secondary Track, formerly part of the Pennsylvania RR, extends from Brockway (Milepost 19.0) to Falls Creek, Pa. (Milepost 27.3), a distance of 8.3 miles, in Jefferson County, Pa. The Pittsburgh & Shawmut RR and the Erie Lackawanna Ry. connect with this line at Brockway (see Line No. 1259). This line continues south to Clearfield via trackage rights over the B&O (see Line No. 268). The Low Grade Secondary Track, PC, connects at Falls Creek and runs west to Red Bank and east to Driftwood. The Baltimore & Ohio RR runs parallel to this line and continues north to Ridgway and south to Clearfield or Pittsburgh, forking near DuBois.

#### Traffic and Operating Information

Stations (with their 1978 carloads) served by this line:	
Minna	627
Total carloads generated by the line	627
Average carloads per week	12.1
Average carloads per mile	130.8
Average carloads per train	5.2
1978 operating information:	
Number of round trips per year	120
Estimated time per round trip (hours)	4.0
Locomotive horsepower	2,000
Train crew size	4

#### Public Comments on Preliminary System Plan

Benjamin Coal Co. has a tippie located near Brockway and ships 1,000 tons of coal daily by rail.

Service at Brockway was stopped two years ago when a portion of track was washed out. The Esquire Fuel Co. trucks approximately 100,000 tons of coal annually 7-8 miles to the Pittsburgh & Shawmut Railroad. Attempts to use the EL or the B&O have failed.

Pennsylvania Public Utility Commission's position is that because the line is now in use to load coal at Minna, it should be retained at least until major repairs are necessary. This is in accord with the statement on page 340 of the Plan on the Association's position on service to fossil-fuel resources.

The PUC also points out that PC indicated in a track waiver petition to FRA that 930 crossties were required, not 1,250, the number used by the Association.

The estimated time per round trip appears to be high considering the traffic and the length of the line.

The Chessie is interested in acquiring approximately 3 miles of the line between Brockway and Minna. (Note: The Chessie system has disaffirmed its interest in this project.)

#### Information for Line-Transfer Decision

Revenue received by PC	\$160,710
Average revenue per carload	\$258

#### Variable (avoidable) cost of continued service:

Cost incurred on the branch line	69,899
Cost of upgrading branch line to FRA	
Class I: (1/10 of total upgrading cost)	7,784
Cost incurred beyond the branch line	128,778

Total variable (avoidable) cost 206,461

Net contribution (loss): total	(45,691)
Average per carload	(73)

This line would require upgrading to meet the requirements of the Federal Railroad Administration's minimum safety standards (Class I track, which has a maximum safe operating speed of 10 m.p.h.). Based on available information, this upgrading would include the replacement of a total of 1,250 crossties (an average of 250 crossties per mile). The portion of this line from Milepost 19.0 to Milepost 22.5 is out-of-service. The line was reanalyzed using a length of 4.8 miles and an estimated time per trip of 4 hours. The out-of-service portion is not reflected in the cost data. Chessie has proposed to build a connection from the B&O at Milepost 22.5 and to purchase 4,000 feet of PC track to serve the coal at Minna.

Service to this line generated a loss of \$45,691 in 1978. Recovery of this loss would require approximately a twofold increase in traffic or a 28-percent rate increase.

#### Disposition

The Ridgway Secondary Track is not designated for transfer to Consolidated Rail Corp. and is available for



## **EXHIBIT C**

**Deed between Conrail and PCTC dated March 30, 1976 (relevant pages)**



FOR
order 16 ant
RECORDED
1808-5-40
SEE
MORTGAGE BOOK
VOL 229 PAGE 289

SEP 12 1978

Document No. 67816  
PC-CRC-RP-173

## DEED

THIS DEED IS MADE BY AND BETWEEN

ROBERT W. BLANCHETTE, RICHARD C. BOND AND JOHN H. MCARTHUR,

AS TRUSTEES OF THE PROPERTY OF

PENN CENTRAL TRANSPORTATION COMPANY, DEBTOR

(collectively "Grantor"), whose address is Six Penn Center,  
Philadelphia, Pennsylvania 19104

AND

CONSOLIDATED RAIL CORPORATION,

a corporation organized and existing under the laws of the  
Commonwealth of Pennsylvania ("Grantee"), whose address is 1818 Market Street,  
Philadelphia, Pennsylvania 19103.

WHEREAS, the Debtor is a railroad in reorganization under Section 77 of the Federal Bankruptcy Act, 11 U.S.C. Sec. 206, and is a railroad in reorganization as that term is defined in the Regional Rail Reorganization Act of 1973 (Public Law 93-236, 87 Stat. 985), as amended ("Act"); and

WHEREAS, by orders of the United States District Court for the Eastern District of Pennsylvania entered in Docket No. 70-347 the above-named individuals were duly appointed and are now serving as Trustees of the property of the Debtor; and

WHEREAS, the United States Railway Association, pursuant to Section 209 (c) of the Act, has certified to the Special United States District Court established pursuant to Section 209 (b) of the Act ("Special Court"), that the rail properties of the Debtor hereinafter described (except those hereinafter reserved and excepted) are to be transferred by the Grantor to the Grantee; and

WHEREAS, pursuant to Section 303 (b) (1) of the Act, the Special Court has ordered the Grantor to convey to the Grantee all of the Grantor's right, title and interest in such rail properties, free and clear of any liens or encumbrances as provided in Section 303 (b) of the Act;

NOW, THEREFORE, pursuant to the Order of the Special Court, the Grantor hereby grants and conveys to the Grantee:

A. All of the Grantor's right, title and interest, legal and equitable, in and to the real property located in the  
County of Allegheny, Commonwealth of Pennsylvania

as described in Exhibit A attached to this Deed as a part hereof, together with all of the appurtenances, hereditaments, franchises, ways, waters, minerals, rights, privileges, improvements, fixtures, licenses, leaseholds, reversions, easements, rights under operating, trackage and joint facility agreements, rents, issues, profits and other interests and items belonging to or in any way appertaining to such real property, including but not limited to all real property items that would properly be recorded in Accounts 1 through 45 and 90 of the Property Accounts prescribed by the Interstate Commerce Commission for Railroad Companies in its Uniform System of Accounts, 49 C.F.R. Part 1201, to the extent that such interests and items belong or in any way appertain to such real property, except as those interests and items belong or appertain to the real property hereinafter reserved and excepted.

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B. 1. The easements and rights to use, operate, maintain, repair, renew, replace and remove on, under, over and across the real property hereinafter reserved and excepted ("Grantor's Burdened Property"), any and all lines, poles, pipes, appliances, equipment, structures, facilities and appurtenances (each an "Easement Item") existing on and used or useful as of the date of delivery of this Deed as a part of any railroad communication, signal or interlocker system or as a part of any electric, telephone, telegraph, water, gas, steam, sanitary sewer, storm sewer or other utility system, together with the easement of reasonable access over the Grantor's Burdened Property to permit the exercise of the foregoing easements and rights, and the easement for lateral support of the real property conveyed by this Deed.

2. The easements and rights for the specific uses, if any, (each an "Easement Item") particularly described in Exhibit B attached to this Deed as a part hereof and burdening certain real property hereinafter reserved and excepted.

3. The Grantee shall give the Grantor reasonable notice before entering on the Grantor's Burdened Property to exercise the easements and rights conveyed in this Paragraph B, and shall exercise such easements and rights (a) so as not to interfere unreasonably with the use and enjoyment of the Grantor's Burdened Property, (b) in compliance with generally applicable reasonable requirements established from time to time by the Grantor and (c) so as not to increase materially the burden on the Grantor's Burdened Property existing on the date of delivery of this Deed. The Grantee shall indemnify and save the Grantor harmless from any loss, damage or expense arising from the exercise of the foregoing easements and rights, without regard to negligence on the part of the Grantor or the Grantee. Upon request of and at the expense of the Grantor, the Grantee shall execute and deliver to the Grantor a deed or other instrument releasing the Grantee's rights in any part of the Grantor's Burdened Property that is not used or reasonably needed by the Grantee in the exercise of the easements and rights conveyed in this Paragraph B.

4. If the location of any Easement Item would interfere with any proposed use or sale of any part of the Grantor's Burdened Property, the Grantor may, at the Grantor's expense and after obtaining the Grantee's written consent, relocate the interfering Easement Item or cause the same to be relocated. Such consent will be granted unless (a) the Easement Item cannot be relocated as proposed by the Grantor without unreasonable interference to the Grantee's operations or without damage to the integrity of the system of which the Easement Item is a part or (b) the Grantee will not have reasonable access to the relocated Easement Item. If the Grantee has previously released its easements and rights in any real property as provided in Paragraph B. 3. and a relocated Easement Item falls, in whole or in part, within the area that has been so released, the Grantor and the Grantee shall exchange the following instruments promptly after the relocation is completed:

(a) The Grantor shall execute and deliver to the Grantee a supplementary deed of easement which conveys to the Grantee with respect to the relocated Easement Item the easements and rights described in this Paragraph B.

(b) The Grantee shall execute and deliver to the Grantor a deed or other instrument of release as provided in Paragraph B. 3.

5. The Grantor shall bear all expenses and the cost of all transfer and recording taxes, fees and charges in connection with all deeds and other instruments delivered pursuant to this Paragraph B.

#### RESERVING AND EXCEPTING, HOWEVER, TO THE GRANTOR:

C. All the respective right, title and interest of the Grantor, legal and equitable, in and to the real property described in Exhibit B attached to this Deed as a part hereof, but subject, however, to (a) the limitation of access thereto across the real property conveyed by this Deed as hereinafter provided and (b) the easements and rights conveyed pursuant to Paragraph B above.

D. 1. The easements and rights to use, operate, maintain, repair, renew, replace and remove on, under, over and across the real property conveyed by this Deed ("Grantee's Burdened Property"), any and all lines, poles, pipes, appliances, equipment, structures, facilities and appurtenances (each an "Easement Item") existing on and used or useful as of the date of delivery of this Deed as a part of any railroad communication, signal or interlocker system or as a part of any electric, telephone, telegraph, water, gas, steam, sanitary sewer, storm sewer or other utility system, together with the easement of reasonable access over the Grantee's Burdened Property to permit the exercise of the foregoing easements and rights, and the easement for lateral support of the real property reserved and excepted from this conveyance

2. The easements and rights for the specific uses, if any, (each an "Easement Item") particularly described in Exhibit B to this Deed and burdening certain real property conveyed by this Deed.



3. The Grantor shall give the Grantee reasonable notice before entering on the Grantee's Burdened Property to exercise the easements and rights reserved and excepted in this Paragraph D, and shall exercise such easements and rights (a) so as not to interfere unreasonably with the use and enjoyment of the Grantee's Burdened Property, (b) in compliance with generally applicable reasonable requirements established from time to time by the Grantee and (c) so as not to increase materially the burden on the Grantee's Burdened Property existing on the date of delivery of this Deed. The Grantor shall indemnify and save the Grantee harmless from any loss, damage or expense arising from the exercise of the foregoing easements and rights, without regard to negligence on the part of the Grantee or the Grantor. Upon request of and at the expense of the Grantee, the Grantor shall execute and deliver to the Grantee a deed or other instrument releasing the Grantor's rights in any part of the Grantee's Burdened Property that is not used or reasonably needed by the Grantor in the exercise of the easements and rights reserved and excepted in this Paragraph D.

4. If the location of any Easement Item would interfere with any proposed use or sale of any part of the Grantee's Burdened Property, the Grantee may, at the Grantee's expense and after obtaining the Grantor's written consent, relocate the interfering Easement Item or cause the same to be relocated. Such consent will be granted unless (a) the Easement Item cannot be relocated as proposed by the Grantee without unreasonable interference to the Grantor's operations or without damage to the integrity of the system of which the Easement Item is a part or (b) the Grantor will not have reasonable access to the relocated Easement Item. If the Grantor has previously released its easements and rights in any real property as provided in Paragraph D. 3. and a relocated Easement Item falls, in whole or in part, within the area that has been so released, the Grantor and the Grantee shall exchange the following instruments promptly after the relocation is completed:

(a) The Grantee shall execute and deliver to the Grantor a supplementary deed of easement which conveys to the Grantor with respect to the relocated Easement Item the easements and rights described in this Paragraph D.

(b) The Grantor shall execute and deliver to the Grantee a deed or other instrument of release as provided in Paragraph D. 3.

5. The Grantee shall bear all expenses and the cost of all transfer and recording taxes, fees and charges in connection with all deeds and other instruments delivered pursuant to this Paragraph D.

E. All mineral rights owned by the Grantor in any parcel as to which an interest in the surface is not conveyed by this Deed.

TO HAVE AND TO HOLD the real property and the easements and rights hereby conveyed to the Grantee, free and clear of (a) any liens or encumbrances as provided in Section 303 (b) of the Act and (b) any and all easements and rights of access to the real property reserved and excepted from this conveyance across the real property conveyed by this Deed (except as otherwise provided in this Deed), even if such easements and rights would otherwise arise by reason of necessity, implication or other operation of law, statute, ordinance, rule or regulation of any governmental entity, BUT SUBJECT, HOWEVER, to (i) those easements and rights reserved and excepted in Paragraph D above, (ii) all existing licenses, easements, leases (other than those which may have been created to secure payment of a financial obligation), and operating, trackage right and joint facility agreements and (iii) Operating Rights Grants, if any, from the Grantor to a third party conveyed concurrently with this conveyance and identified in Exhibit B to this Deed.

The Grantor hereby covenants that the Grantor will perform, execute, acknowledge and deliver any and all such further acts, deeds, assignments and other instruments as may be reasonably requested by the Grantee to convey, confirm, clarify, identify or more precisely describe the real property and the easements and rights conveyed by this Deed or intended so to be in order to carry out the intent of this Deed in light of the designations contained in the Final System Plan which has been certified to the Special Court by the United States Railway Association pursuant to the Act, and to effect the recordation of, or otherwise perfect, this Deed and all such other deeds, assignments and instruments under any applicable statute, ordinance, rule or regulation.

The Grantee hereby covenants that the Grantee will perform, execute, acknowledge and deliver any and all such further acts, deeds, assignments and other instruments as may be reasonably requested by the Grantor to confirm, clarify, identify or more precisely describe the real property and the easements and rights reserved and excepted from this conveyance or intended so to be in order to carry out the intent of this Deed in light of the designations contained in such Final System Plan, and to effect the recordation of, or otherwise perfect, this Deed and all such other deeds, assignments and instruments under any applicable statute, ordinance, rule or regulation.



By acceptance of this Deed, the Grantee (a) agrees to perform each of the obligations imposed on the Grantee by the terms of this Deed, and (b) assumes and agrees to perform and observe all obligations and conditions on the part of the Grantor or the Grantor's predecessor in title to be performed or observed that arise or accrue after the date of delivery of this Deed under all licenses, easements, leases (other than those which may have been created to secure payment of a financial obligation) and operating, trackage right and joint facility agreements (subject, however, to the terms thereof) which are conveyed by this Deed and under those to which this conveyance is made subject, provided that the Grantee assumes no obligation or liability that arises after the date of delivery of this Deed out of any event, act or failure to act that occurred prior thereto and, where an obligation or liability is related to a period which is both before and after such date, the Grantee assumes only that portion of the obligation or liability which is reasonably allocable to the part of the period after such date. Concurrently with the delivery of this Deed, the Grantee is delivering to the Grantor a separate instrument executed by the Grantee acknowledging receipt and acceptance of this Deed and affirming the provisions of this paragraph.

All of the covenants of the Grantor and the Grantee, respectively, shall be deemed to be real covenants and shall run with the land.

The words "Grantor" and "Grantee" used herein shall be construed as if they read "Grantors" and "Grantees", respectively, whenever the sense of this Deed so requires and, whether singular or plural, such words shall be deemed to include in all cases the successors and assigns of the respective parties.

This conveyance and the specific covenants of the Grantor are made by the Grantor as Trustees of the property of the Debtor, and not individually, and this conveyance is made without covenants of title or any warranties express or implied. Page 4A is attached to this Deed as a part hereof.

IN WITNESS WHEREOF, the Grantor has caused this Deed to be executed this 30<sup>th</sup> day of March, 1976 by Malcolm V. Lane, Jr. being duly authorized so to do by order of the United States District Court for the Eastern District of Pennsylvania entered in Docket No. 70-347.

Signed and Acknowledged  
in the Presence of:

Anna B. Freund  
Anna Freund

Peter S. Reichertz  
Peter S. Reichertz

ROBERT W. BLANCHETTE, RICHARD  
C. BOND AND JOHN H. MCARTHUR,  
AS TRUSTEES OF THE PROPERTY OF  
PENN CENTRAL TRANSPORTATION  
COMPANY, DEBTOR

By Malcolm V. Lane, Jr. L.S.  
Malcolm V. Lane, Jr.  
OFFICER

DISTRICT OF COLUMBIA, SS:

On this 30<sup>th</sup> day of March, 1976, before me, a Notary Public authorized to take acknowledgements and proofs in the District of Columbia, personally appeared Malcolm V. Lane, Jr., personally known to me to be the person whose name is subscribed to the foregoing Deed, bearing the same date as this certificate of acknowledgement, and acknowledged himself to be an Officer of Robert W. Blanchette, Richard C. Bond and John H. McArthur, Trustees of the Property of Penn Central Transportation Company, Debtor, and that as such Officer and being authorized so to do, he executed the foregoing Deed on behalf of and in the name of the Trustees as their free act and deed for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

This Instrument Prepared By:

United States Railway Association  
Pursuant to the Act

Gerald L. Linz  
Notary Public in and for  
The District of Columbia  
My Commission expires January 31, 1980



Document No.

PC-CRC-RP-173

**EXHIBIT A**

TO THE DEED BY AND BETWEEN

**ROBERT W. BLANCHETTE, RICHARD C. BOND AND JOHN H. MCARTHUR,**

**AS TRUSTEES OF THE PROPERTY OF**

**PENN CENTRAL TRANSPORTATION COMPANY, DEBTOR**

**AND**

**CONSOLIDATED RAIL CORPORATION**

---

**DESCRIPTION OF REAL PROPERTY**

**LOCATED IN**

**County of Allegheny, Commonwealth of Pennsylvania**

---

For the purpose of each description contained in this Exhibit A (and solely by way of illustration and not by way of limiting the generality of the term "adjacent"), adjacency shall be deemed to exist without regard to the existence of any public or private street, highway, alley or other way between one part of the Grantor's real property and another.

This Exhibit A consists of the following pages: A-1, A-2, A-3, A-4, A-5, A-6, A-7, A-8, A-9, A-10, A-11, A-11-A, A-12, A-13, A-13-A, A-14, A-15, A-16, A-17 Revised, A-18, A-19

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**A-1**



Document No.

PC-CRC-RP-173

Situate in the County of Allegheny, Commonwealth of Pennsylvania, and being the Penn Central Transportation Company's line of railroad known as the Allegheny Branch, and being all the real property in the County lying in, under, above, along, contiguous to, adjacent to or connecting to such line.

Such line originates in the County near 11th Street in Pittsburgh, connecting to another line of railroad known as Philadelphia-Pittsburgh Main Line, passes through Nadine and Oakmont and leaves the County near Logans Ferry.

The line of railroad described herein is identified as Line Code 2229 in the records of the United States Railway Association.

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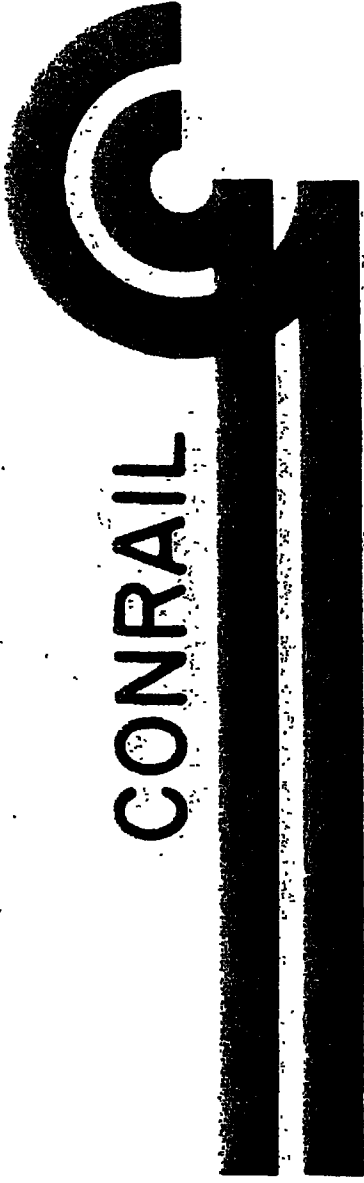


## **EXHIBIT D**

**Conrail Maintenance Program and Track Chart, Central Region, Pittsburgh Division (1977 and 1983)**



**CONRAIL**



**MAINTENANCE PROGRAM**

**AND**

**TRACK CHART**

**CENTRAL REGION  
PITTSBURGH DIVISION**

**CORRECT TO 1-1-77**



NAME	BETWEEN	M.P. TO M.P.	CODE
MAIN (PHILA. TO PGH.)	JD, GREENSBURG & PITTSBURGH	290.2-353.2	2202
MAIN (PGH. TO CHICAGO)	PITTSBURGH & WOOD	0.0-34.0	2202
MAIN (CONEMAUGH)	JD & LOCKPORT	-3.0-0.0	2211
MAIN (CONEMAUGH)	LOCKPORT, BUTLER JCT. & 'PENNA AVE."	0.0-77.9	2211
MAIN (PGH. TO COLUMBUS)	PITTSBURGH & NEWCOMERSTOWN	0.0-109.0	2206
ALLEGHENY SEC. TRACK	PGH. (11st ST.) NADINE & RED BANK	0.0-63.4	2229
ALLEGHENY BR. CONNECTION	BRILLIANT BR. & NADINE	0.0-1.6	2228
APOLLO BRANCH	APOLLO & END	0.0-1.9	2241
AVONMORE BRANCH	AVONMORE & END	0.0-1.9	2286
AXLE WORKS BRANCH	HAYS & JCT. WITH UNION R.R.	0.0-0.6	2251
BAILEY RUN BRANCH	CREIGHTON & END	0.0-0.3	2292
BAYARD BRANCH	ROCHESTER, YELLOW CREEK & RIVER	0.0-26.6	2230
BEAVER-VALLEY BRANCH	VANPORT	0.0-0.3	2230
BLAIRSVILLE IND. TRACK	BLAIRSVILLE & BLACK LICK	2.7-7.3	2240
BLOCK HOUSE RUN BRANCH	ROCHESTER & NEW BRIGHTON	0.0-2.3	22FF
BRIDGEVILLE & McDONALD BRANCH	BRIDGEVILLE	0.0-1.4	2246
BRILLIANT BRANCH	EAST LIBERTY (CM), UY & ASPINWALL	0.4-3.0	2226
BRUSH CREEK BRANCH	JEANNETTE, PA.	0.0-0.6	2289
BULL RUN BRANCH	JEANNETTE, PA.	0.0-0.7	2290
BURGETTS BRANCH	BURGETTSTOWN & ATLASBURG	0.0-4.3	2247
BUTLER SECONDARY	BUTLER JCT. & BUTLER (VO)	0.0-21.0	2243
CADIZ IND. TRACK	GEORGETOWN JCT. & CADIZ	6.5-7.9	2238
CADIZ SECONDARY	CADIZ JCT. & GEORGETOWN JCT.	0.0-5.5	2238
CAPTINA SECONDARY	POWHATAN & END	0.0-17.9	2237
COKEBURG BRANCH	COKEBURG JCT.	0.0-0.5	2255
CORLISS CONNECTING TRACK	CORLISS & SHERIDAN BRANCH	0.6-1.0	2222
EAST PITTSBURGH BRANCH	EAST PITTSBURGH & TURTLE CREEK	0.0-1.9	2275
ECONOMY BRANCH	AMBRIDGE	0.2-1.3	22EE
ECONOMY BRANCH EXTENSION	AMBRIDGE & BADEN	0.0-3.0	22DD
ELLSWORTH SECONDARY	MONONGAHELA & COKEBURG JCT.	0.0-11.9	2254
GREENSBURG SECONDARY	GREENSBURG JCT. & COUNTY JCT.	0.0-2.5	2216
HANNA SECONDARY	GEORGETOWN JCT. & GEORGETOWN (NEW RR)	-1.0-6.2	2239
HEMPFIELD IND. TRACK	HEMPFIELD BR. JCT. & HERMINIE	0.0-8.9	2268
INDIAN RUN BRANCH	NEW KENSINGTON & PARNASSUS	0.0-1.9	2288
JEANNETTE BRANCH	JEANNETTE	0.0-1.2	2282
JUNCTION NO. 1 BRANCH	ROSSLYN & CARNEGIE	0.0-2.5	22KK
LANGLOTH BRANCH	BURGETTSTOWN	0.0-0.5	2249
LATROBE IND. TRACK	LATROBE & KINGSTON	0.0-3.5	2299
LOW GRADE BRANCH	ROCHESTER & NEW BRIGHTON	25.9-29.3	2233
MANOR BRANCH	MANOR	0.0-1.6	2281



NAME	BETWEEN	M.P. TO M.P.	CODE
MARGINAL BRANCH	BEAVER FALLS	0.0- 1.8	22JJ
MARIANNA SECONDARY	COKEBURY JCT. & MARIANNA	11.9- 20.7	2254
MONONGAHELA BRANCH	MONON & MONONGAHELA	0.0- 30.0	2220
MONONGAHELA SECONDARY	MONONGAHELA & W. BROWNSVILLE JCT. (BF)	30.0- 52.0	2220
NEW CUMBERLAND SECONDARY	WEIRTON JCT. & CHESTER	0.0- 22.0	2234
OHIO CONN. & WYE	"ESPLEN" & "JACKS RUN"	0.0- 2.7	2223
OHIO CONN.	BRIDGE & "PENNA. AVE."	0.0- 1.4	2224
OIL STREET SIDING	BEAVER FALLS	0.0- 0.6	22HH
OMAL SECONDARY	POWHATAN & OMAL	58.7- 72.7	2231
OPOSSUM RUN BRANCH	CONNELLSVILLE	0.0- 0.3	2263
PETERS CREEK BRANCH	CLAIRTON & LARGE	0.0- 3.2	2253
PLUM CREEK BRANCH	VERONA	0.0- 1.1	2296
PORT PERRY BRANCH	THOMSON (PG) & E. PGH. (WG)	0.0- 2.3	2219
POWHATAN SECONDARY	BRILLIANT & POWHATAN	23.6- 58.7	2231
RADEBAUGH SECONDARY	COUNTY JCT. & RADEBAUGH (RG)	0.0- 4.0	2218
REDSTONE SECONDARY	BROWNSVILLE	52.0- 52.5	2258
RIVER BRANCH	YELLOW CREEK & BRILLIANT	0.0- 23.6	2231
SCHENLEY BRANCH	SCHENLEY & LEECHBURG	0.0- 6.1	2242
SCOTTDALE BRANCH	SCOTTDALE & MT. PLEASANT	0.0- 5.5	2265
SCULLY BRANCH	"OB", "ELLIOTT" & "WAGNER"	-4.0- 7.0	2221
SEWICKLEY IND. TRACK	YOUNGWOOD & UNITED	0.0- 6.4	2271
SHERIDAN BRANCH	CORLISS CONN. TRACK & ESPLEN	0.0- 0.6	2222
SOUTHWEST SECONDARY	COUNTY JCT. & DARENT	2.5- 31.7	2217
SUPERIOR BRANCH	CARNEGIE	0.0- 0.8	22BB
TARR BRANCH	RUFFSDALE, PA. (O.S.)	0.0- 0.7	2266
TERMINAL IND. TRACK	OHIO JCT., MARTINS FERRY & BENWOOD	0.0- 6.9	2236
TURTLE CREEK BRANCH	TRAFFORD & EXPORT	0.0- 10.2	2277
TYLERDALE CONN. RR	WASHINGTON & TYLERDALE	0.0- 1.3	22CC
UNITY BRANCH	LATROBE, PA.	0.0- 0.9	2285
WASHINGTON SECONDARY	CARNEGIE, CANNONSBURG & WASHINGTON	0.5- 23.6	2244
WEST BROWNSVILLE SECONDARY	WEST BROWNSVILLE & MILLSBORO	52.0- 62.0	2257
WHITE HALL BRANCH	PITTSBURGH SOUTH SIDE	0.0- 2.0	2250
WHEELING SECONDARY	WEIRTON JCT., WHEELING & BENWOOD	0.0- 28.0	2235
WINFIELD BRANCH	WINFIELD JCT. & WINFIELD R.R.	0.0- 8.5	2287
YELLOW CREEK SECONDARY	RIVER & BRANCH	0.0- 1.0	2232
YOUGHIOGHENY BRANCH	IRWIN	0.0- 2.1	2280
YUKON SECONDARY	HUNKER & HUTCHISON MINE	0.0- 9.1	2267





MAINTENANCE PROGRAM  
AND

TRACK CHART

CENTRAL REGION  
PITTSBURGH DIVISION

1983





1983 CHART

PITTSBURGH DIVISION CENTRAL REGION

INDEX

LINE NAME	BETWEEN	N.P. TO M.P.	CODE	STATE	PAGE
M. L. (PHILA. & PGH.)	CONPITT & PITTSBURGH	290.2-353.2	22-2202	PA	1-7
M. L. (PGH. & CHI.)	PITTSBURGH & WOOD	0.0-34.0	22-2202	PA	8-11
M. L. (CONEMAUGH)	CONPITT & LOCKPORT	-3.0-0.0	22-2211	PA	12-12
M. L. (CONEMAUGH)	LOCKPORT, BUTLER JCT-PENNA. AVE	0.0-77.9	22-2211	PA	13-22
M. L. (PGH. & COL.)	PITTSBURGH & PA/MV ST/LINE	0.0-35.1	22-2206	PA	23-26
M. L. (PGH. & COL.)	PA/MV ST/LINE & MV/MV ST/LINE	35.1-42.1	22-2206	PA	26-27
M. L. (PGH. & COL.)	MV/MV ST/LINE & NEWCOHERSTOWN	42.1-109.0	22-2206	OH	27-33
M. L. (PGH. & COL.)	NEWCOHERSTOWN & EAST COLUMBUS	109.0-186.1	22-8106	OH	34-42
M. L. (PGH. & COL.)	BRILLIANT BR. & MADINE	0.0-1.6	22-2228	PA	61-61
ALLEGHENY BR. COMM.	PGH. 11TH ST-MADINE	0.0-63.4	22-2229	PA	62-68
ALLEGHENY SEC. TK.	APOLLO & END	0.0-1.9	22-2241	PA	84-84
APOLLO INO. TK.	AVONMORE & END	0.0-1.9	22-2286	PA	122-122
AVONMORE INO. TK.	HAYS & JCT. WITH UNION R.R.	0.0-0.6	22-2251	PA	107-107
AXLE WORKS INO. TK.	CREIGHTON & END	0.0-0.3	22-2292	PA	127-127
BAYLEY RUN INO. TK.	ROCHESTER & STATE LINE	0.0-14.6	22-2230	PA	69-70
BAYARD BR.	STATE LINE & RIVER	14.6-26.6	22-2230	OH	70-71
BAYARD BR.	VANPORT	0.0-0.3	22-2266	PA	133-133
BEAVER VALLEY INO.	COKEBURG JCT. & MARIANNA	11.9-20.7	22-2254	PA	110-111
BETH INO.	BLAIRSVILLE & BLACK LICK	0.0-5.3	22-2240	PA	82-82
BLAIRSVILLE SEC.	ROCHESTER & NEW BRIGTON	0.0-2.3	22-22FF	PA	132-132
BLACK HOUSE RUN INO. TK.	BRIDGEVILLE	0.0-1.0	22-2246	PA	96-96
BRIDGEVILLE-MCDONALD INO. TK.	E. LIBERTY (CH) UT & ASPINMALL	0.4-3.0	22-2226	PA	60-60
BRIILLIANT BR.	JEANNETTE	0.0-0.6	22-2289	PA	125-125
BRUSH CREEK INO. TK.	JEANNETTE	0.0-0.7	22-2290	PA	126-126
BULL RUN INO. TK.	BURGETTSTOWN & ATLASBURG	0.0-4.3	22-2247	PA	103-103
BURGETTS INO. TK.	BUTLER JCT. & BUTLER IVJ	0.0-21.0	22-2243	PA	97-99
BUTLER SEC.	CROIZ JCT. & GEORGETOWN JCT.	0.0-5.5	22-2238	OH	92-92
CROIZ SEC.	POWATAN & END	0.0-17.9	22-2237	OH	90-91
CAPTAINA SEC.	COKEBURG JCT	0.0-0.5	22-2255	PA	106-106
COKEBURG INO. TK.	COKEBURG JCT	0.5-1.3	22-2255	PA	106-106
COKEBURG LEAD	CORLISS & SHERIDAN BR.	0.6-1.0	22-2222	PA	55-55
CORLISS CONNECTING TK.	E. PITTSBURGH & TURTLE CREEK	0.0-1.9	22-2276	PA	116-116
EAST PITTSBURGH INO. TK.	AMBRIDGE & BROEN	0.0-3.0	22-2200	PA	130-130
ECONOMY SEC. EXT.	AMBRIDGE	0.2-1.3	22-22EE	PA	131-131
ECONOMY SEC.	MONONGAHELA & COKEBURG JCT.	0.0-11.9	22-2254	PA	109-110
ELLSWORTH SEC.	GEORGETOWN JCT. & CROIZ	6.5-7.9	22-2238	OH	92-92
GEORGETOWN INO. TK.	GREENSBURG JCT. & COUNTY JCT.	0.0-2.5	22-2216	PA	43-43
GREENSBURG INO. TK.					





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LINE NAME	BETWEEN	M.P. TO M.P.	CODE	STATE	PAGE
HANNA SEC.	GEORGETOWN JCT.	5.5- 6.5	22-2230	OH	92- 92
HANNA SEC.	GEORGETOWN JCT. & GEORGETOWN	0.0- 6.2	22-2239	OH	93- 93
HEBRON SEC.	HEATH & HEBRON	133.4-138.9	22-8130	OH	137-137
INDIAN RUN IND. TK.	NEW KENSINGTON & PARNASSUS	0.0- 1.9	22-2288	PA	123-123
JEANNETTE IND. TK.	JEANNETTE	0.0- 1.2	22-2282	PA	120-120
LANGLOTH IND. TK.	BURGETTSTOWN	0.0- 0.5	22-2249	PA	104-104
LATROBE IND. TK.	LATROBE & KINGSTON	0.0- 3.5	22-2299	PA	128-128
LOW GRADE BR.	ROCHESTER & NEW BRIGHTON	25.9- 29.9	22-2233	PA	81- 81
MANOR IND. TK.	MANOR	0.0- 1.6	22-2281	PA	119-119
MARGINAL IND. TK.	BEVER FALLS	0.0- 1.8	22-22JJ	PA	136-136
MONONGAHELA BR.	MONON & MONONGAHELA	0.0- 30.0	22-2220	PA	49- 51
MONONGAHELA SEC.	MONONGAHELA & W. BROWNSVILLE JCT.	30.0- 52.0	22-2220	PA	52- 54
NEW CUMBERLAND SEC.	WEIATON JCT. & CHESTER	0.0- 22.0	22-2234	WV	83- 85
OHIO CONN. & MYE	"ESPLEN" & "BELL"	0.0- 2.7	22-2223	PA	58- 58
OHIO CONN.	BRIDGE & "PENNA. AVE."	0.0- 1.4	22-2224	PA	59- 59
OIL STREET IND. TK.	BEVER FALLS	0.0- 0.6	22-22HH	PA	134-134
OMAL SEC.	POWHATAN & OMAL	58.7- 72.7	22-2231	OH	78- 80
OPOSSUM RUN IND. TK.	CONNELLSVILLE	0.0- 0.9	22-2263	PA	114-114
PETERS CREEK IND. TK.	CLAYTON & LARGE	0.0- 3.2	22-2253	PA	108-108
PLUM CREEK IND. TK.	VERONA	0.0- 1.1	22-2296	PA	124-124
PORT PERRY BR.	THOMSON (PERRY) & E. POWHATING	0.0- 3.1	22-2219	PA	48- 48
POWHATAN IND.	ROCKVILLE & BRILLIANT	19.6- 23.6	22-2231	PA	74- 75
POWHATAN SEC.	BRILLIANT & POWHATAN	23.6- 58.7	22-2231	OH	75- 78
RADEBRUGH SEC.	COUNTY JCT. & RADEBRUGH (RADE)	0.0- 4.0	22-2218	PA	47- 47
REDSTONE SEC.	BROWNSVILLE	52.0- 53.1	22-2258	PA	113-113
RIVER BR.	YELLOW CREEK & ROCKVILLE	0.0- 19.6	22-2231	OH	73- 74
SCHENLEY IND. TK.	SCHENLEY & LEECHBURG	0.0- 6.1	22-2242	PA	95- 95
SCOTTDALE IND. TK.	SCOTTDALE & MT. PLEASANT	0.0- 5.5	22-2265	PA	115-115
SCULLY BR.	BECK & WAGNER	-4.0- 7.0	22-2221	PA	56- 57
SHERIDAN BR.	CORLISS CONN. TK. & ESPLEN	0.0- 0.6	22-2222	PA	55- 55
SOUTHWEST SEC.	COUNTY JCT. & OUNBAR	2.5- 28.1	22-2217	PA	44- 46
SUPERIOR IND. TK.	CARNEGIE	0.0- 0.8	22-2288	PA	129-129
TERMINAL IND. TK.	OHIO JCT. & STATE LINE	0.0- 1.8	22-2236	OH	89- 89
TERMINAL IND. TK.	STATE LINE - BENWOOD	1.8- 6.9	22-2236	WV	89- 89
TRAINWAY SEC.	TRAINWAY & ZANESVILLE	0.3- 14.1	22-8134	OH	138-139
TURTLE CREEK IND. TK.	TRAFFORD	0.0- 0.9	22-2277	PA	117-117
UNITY IND. TK.	LATROBE	0.0- 0.9	22-2285	PA	121-121





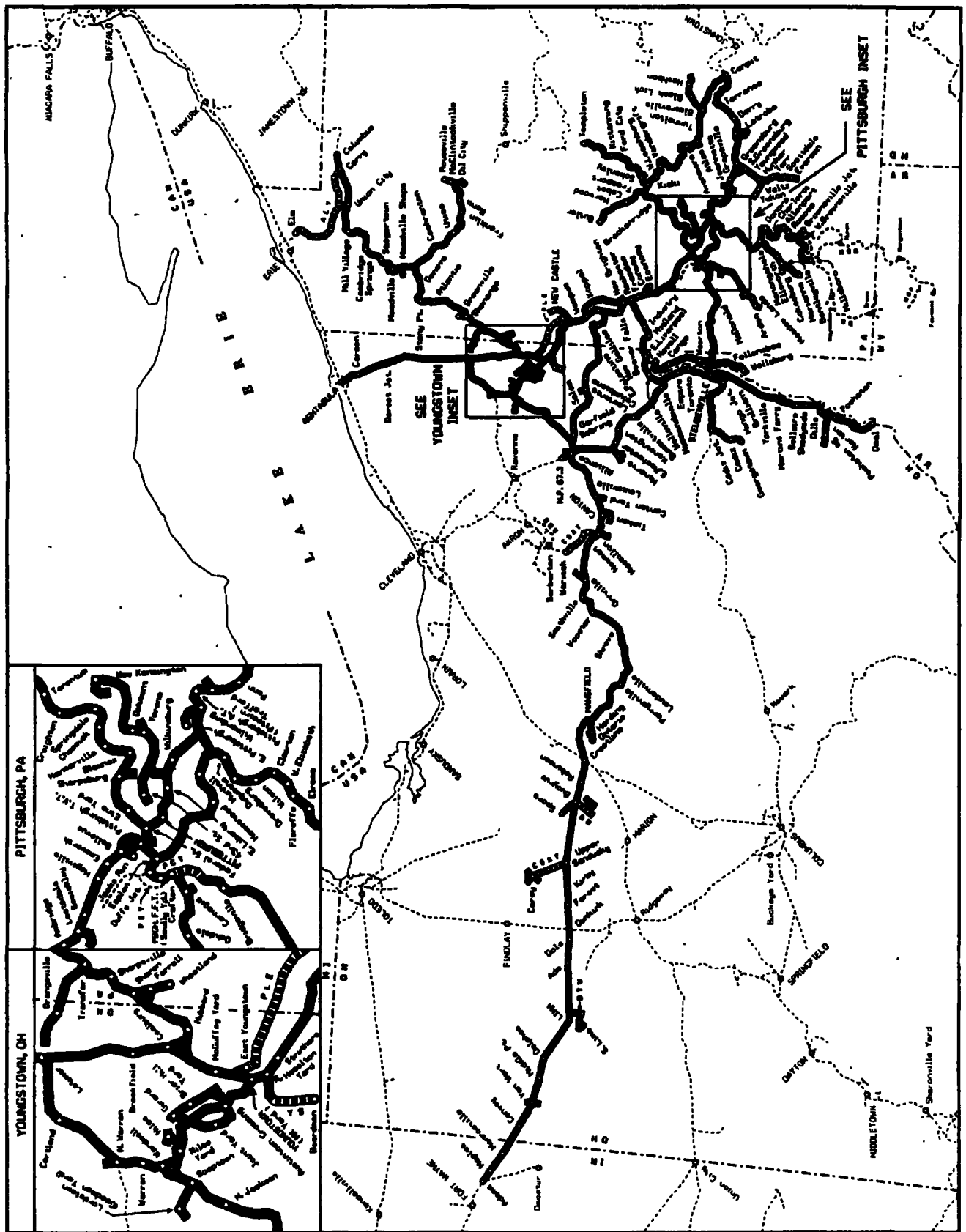
LINE NAME	BETWEEN	M.P. TO M.P.	CODE	STATE	PAGE
WASHINGTON SEC.	GLENN & WASHINGTON	0.5- 23.6	22-2244	PA	100-102
WHEELING SEC.	WEIATON JCT. & WHEELING	0.0- 24.1	22-2235	WV	88- 88
WHEELING IND.	WHEELING & BENWOOD	24.1- 28.0	22-2235	WV	88- 88
WHITE HALL IND. TK.	PITTSBURGH SOUTH SIDE	0.0- 2.0	22-2250	PA	105-105
YELLOW CREEK SEC.	RIVER & BRANCH	0.0- 1.0	22-2232	OH	72- 72
TOUGHIOGHENY IND. TK.	IRWIN	0.0- 2.1	22-2280	PA	118-118
TUKON IND. TK.	HUNKER & HUTCHINSON MINE	0.0- 9.1	22-2267	PA	112-112
ZANESVILLE TO-RUN. TK.	ZANESVILLE & PUTNAM	14.1- 16.5	22-8134	OH	139-139
ZANESVILLE SEC.	ZANESVILLE	16.5- 18.2	22-8135	OH	140-140
105 SEC.	CHAR & GLENN	0.0- 2.5	22-22KK	PA	135-135



## **EXHIBIT E**

**Conrail system map circa mid-to-late 1980's**





**PITTSBURGH DIVISION**  
(Central Region)



## **EXHIBIT F**

**Conrail Maintenance Program and Track Chart, Pittsburgh Division (1994)**





# MAINTENANCE PROGRAM AND

# TRACK CHART

PITTSBURGH DIVISION

1994



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L I N E N A M E	B E T W E E N			FROM MILEPOST	TO MILEPOST	RDBR CODE	STATE	PAGE
CHICAGO LINE				8.2	68.4	40 3500	NY	14-20
CHICAGO LINE				68.4	112.4	40 3500	PA	9-14
CHICAGO LINE				112.4	194.3	40 3500	OH	1-9
CLEVELAND LINE				0.0	14.6	40 2230	PA	36-37
CLEVELAND LINE				14.6	26.6	40 2230	OH	35-36
CLEVELAND LINE				26.6	54.4	40 2430	OH	31-34
CLEVELAND LINE				54.4	67.0	40 2426	OH	29-30
CLEVELAND LINE				67.0	90.0	40 2412	OH	26-28
CLEVELAND LINE				90.0	102.0	40 2412	OH	24-25
CLEVELAND LINE				102.0	123.3	40 3512	OH	21-23
CONEMAUGH LINE				0.0	5.0	40 2211	PA	101-101
CONEMAUGH LINE				5.0	25.0	40 2211	PA	98-100
CONEMAUGH LINE				25.0	77.9	40 2211	PA	92-97
FORT WAYNE LINE				0.0	34.0	40 2202	PA	81-84
FORT WAYNE LINE				34.0	48.8	40 2402	PA	79-80
FORT WAYNE LINE				48.8	200.6	40 2402	OH	63-79
FORT WAYNE LINE				200.6	300.4	40 3102	OH	52-62
FORT WAYNE LINE				300.4	314.0	40 3102	IN	51-52
HEADVILLE LINE				1.8	13.2	40 6542	PA	126-127
HEADVILLE LINE				56.3	102.3	40 6501	PA	119-125
HEADVILLE LINE				105.4	136.3	40 6501	PA	116-119
HEADVILLE LINE				136.3	144.3	40 6502	PA	114-115
HEADVILLE LINE				144.3	149.5	40 6502	OH	114-114
HEADVILLE LINE				149.5	150.8	40 2443	OH	113-113
MON LINE				0.0	2.7	40 2223	PA	108-108



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L I N E N A M E	B E T W E E N	FROM MILEPOST	TO MILEPOST	RDBR CODE	STATE	PAGE
MON LINE	CP ESLEN & CAL	2.4	55.9	40 2220	PA	102-107
PITTSBURGH LINE	CONPITT & PITTSBURGH	290.2	353.2	40 2202	PA	85- 91
RIVER LINE	YELLOW CREEK & ROCK	0.0	17.3	40 2231	OH	134-135
RIVER LINE	BRILLIANT & POWHATAN	23.6	57.0	40 2231	OH	130-133
SHORT LINE	COLLINWOOD & SHORT	0.0	17.7	40 3531	OH	111-112
SHORT LINE	SHORT & BEREA	17.7	22.3	40 3532	OH	109-109
YOUNGSTOWN LINE	ASHTABULA & CREEK	0.0	58.3	40 2440	OH	45- 50
YOUNGSTOWN LINE	CREEK & PA/OH STATELINE	58.4	66.2	40 2423	OH	43- 44
YOUNGSTOWN LINE	PA/OH STATE LINE & WAMPUM JCT.	66.2	81.3	40 2423	PA	41- 43
YOUNGSTOWN LINE	WAMPUM JCT. & NEW BRIGHTON	81.3	93.8	40 2433	PA	39- 40
YOUNGSTOWN LINE	NEW BRIGHTON & ROCHESTER	93.8	97.2	40 2233	PA	38- 38
AKRON SEC.	HUDSON & CUYAHOGA FALLS	0.0	8.0	40 2421	OH	191-191
ALLIANCE R.T.	RING & ALLIANCE	33.6	38.0	40 2425	OH	193-193
AUSTINTOWN I.T.	BRIAR HILL & LEADVILLE	0.0	0.7	40 6556	OH	234-234
AVONMORE I.T.	AVONMORE & END	0.0	1.9	40 2286	PA	177-177
AXLE WORKS I.T.	HAYS & JCT. WITH UNION R.R.	0.0	0.0	40 2251	PA	166-166
BENTON I.T.	ALLIANCE	22.9	24.7	40 2445	OH	209-209
BLAIRSVILLE I.T.	BLAIRSVILLE & BLACK LICK	0.0	5.7	40 2240	PA	161-161
BLAIRSVILLE SEC.	BLACK LICK & DIGS	5.7	17.5	40 224J	PA	159-160
BLACK HOUSE RUN I.T.	ROCHESTER & NEW BRIGHTON	0.0	2.3	40 22FF	PA	180-180
BRILLIANT I.T.	ASPINWALL & SHARP	2.0	3.0	40 2226	PA	143-143
C.E.I.LEAD	WILLOUGHBY & CLEV.ELECTRIC	0.0	2.4	40 3542	OH	214-214
CANFIELD I.T.	HASELTON & Y&S CONN.	0.0	2.5	40 2462	OH	211-211
CANON I.T.	CHAK & GLENN	0.0	2.5	40 22KK	PA	165-165
CANON I.T.	GLENN & TYLERDALE	0.5	20.5	40 2244	PA	162-164



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LINE NAME	B E T W E E N	FROM MILEPOST	TO MILEPOST	RDBR CODE	STATE	PAGE
CAPTINA R.T.	POWATAN & END	0.0	17.9	40 2237	OH	157-158
CHRYSLER LEAD	TWIN & CROWN(CHRYSLER YD)	0.0	2.4	40 3537	OH	215-215
COKEBURG I.T.	COKEBURG JCT.	0.0	2.6	40 2255	PA	170-170
COLEMAN I.T.	NADINE & JCT. WITH VALLEY I.T.	0.0	2.5	40 2229	PA	148-148
DETOUR R.T.	DETOUR & PINE	11.7	15.5	40 2424	OH	198-198
DUNKIRK I.T.	DUNKIRK	458.4	459.5	40 6551	NY	233-233
EAST BR.	BROWNSVILLE & PA/WV STATELINE	0.0	35.7	40 8001	PA	245-248
EAST BR.	PA/WV STATELINE & LOVE	35.7	79.6	40 8001	WV	248-252
EAST PITTSBURGH I.T.	E.PITTSBURGH & TURTLE CREEK	0.0	1.9	40 2276	PA	173-173
ECONOMY IND TRK EXT	AMBRIDGE & BADEN	1.0	3.0	40 22DD	PA	179-179
ELLSWORTH I.T.	COKE & MARIANA	11.9	19.4	40 2254	PA	168-168
ELLSWORTH SEC.	HONONGAHELA & COKE	0.0	11.9	40 2254	PA	168-169
ERIE YARD I.T.	ERIE & ELM	0.0	2.8	40 3515	PA	213-213
FLATS I.T.	DRAWBRIDGE & CLARK	9.2	12.9	40 3534	OH	110-110
FLATS I.T.	CLARK & SHORT	12.9	17.7	40 3532	OH	109-109
FRANKLIN I.T.	FRANKLIN & OIL CITY	23.0	33.6	40 6561	PA	235-236
FRANKLIN SEC.	BUCHANAN & FRANKLYN	0.0	23.0	40 6561	PA	236-238
FREDONIA I.T.	DUNKIRK & FREDONIA	0.0	3.0	40 2340	NY	239-239
FREEDOM SEC	CP E WAR & BRADY LAKE	160.6	188.4	40 6501	OH	221-224
FREEDOM SEC.	BRADY LAKE & AKRON	188.4	201.4	40 6601	OH	219-221
GEM I.T.	SOAP TOWN & GOODMAN YD.	0.0	2.2	40 2439	OH	207-207
GOULD I.T.	MING & GOULD	46.0	49.5	40 2206	OH	181-181
GREENSBURG I.T.	GREENSBURG JCT. & COUNTY JCT.	0.0	2.5	40 2216	PA	137-137
HARBOR CONNECTING TRACK	'OD' & ASHTABULA HARBOR(JH)	0.0	1.4	40 2465	OH	212-212
HARDING I.T.	HANS & ONTARIO	268.8	275.6	40 6601	OH	241-241



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HARVARD CONN.	CP-9 & WHITE	0.0	1.8	40 3541	OH	217-217
HASELTON	YOUNGSTOWN	67.9	69.1	40 6555	OH	232-232
HUGO I.T.	HUGO(END OF TK.) & BRADY	25.5	27.4	40 2444	OH	202-202
INDIAN RUN I.T.	NEW KENSINGTON & PARNASSUS	0.0	1.3	40 2288	PA	178-178
ISLAND SEC.	BRIDGE & 'PENNA. AVE'	0.0	1.4	40 2224	PA	142-142
JEANNETTE I.T.	JEANNETTE	0.0	0.2	40 2282	PA	175-175
KOPPEL SEC.	WAMPUM JCT. & WOOD	81.1	87.5	40 2422	PA	192-192
LATROBE I.T.	LATROBE & KINGSTON	0.0	2.0	40 2299	PA	176-176
LIMA I.T.	LIMA	51.1	54.3	40 6604	OH	240-240
LORDSTOWN SEC	CREEK & BOANNA	0.0	12.8	40 2423	OH	196-197
LORDSTOWN SEC.	BOANNA & RING	12.8	33.6	40 2425	OH	193-195
M&C I.T.	MASSILLON (HACE) & E.GRAVEL	0.0	2.0	40 2431	OH	203-203
MANOR SPUR	MAN & BAILEY MINE	0.0	15.4	40 8006	PA	261-262
MEAD I.T.	MEAD & CP BK	102.3	105.4	40 6501	PA	119-119
MIRACLE RUN BR.	CLIFF & FEDERAL #2	0.0	6.0	40 8005	WV	260-260
MON R.T.	W.BROWNSVILLE	55.9	58.2	40 2220	PA	102-102
NEW CASTLE CONNECTION	CASTLE & CP 46(P&LE)	46.5	47.3	40 2452	OH	210-210
NEWELL I.T.	WEIRTON JCT.& NEWELL	0.0	19.2	40 2234	WV	154-155
NILES SEC.	PINE & WAR	15.5	17.3	40 2424	OH	198-198
NILES SEC.	CP EAST WAR & LATIMER	17.3	30.8	40 6501	OH	199-201
OHIO WORKS I.T.	OHIO WORKS JCT.& GIRARD	4.1	6.0	40 6557	OH	228-228
OIL CITY I.T.	OIL CITY & 'BRIDGE'	0.0	2.0	40 2328	PA	189-189
OIL CITY I.T.	OIL CITY & BRIDGE	129.5	132.3	40 2329	PA	190-190
OMAL R.T.	POWATAN & OMAL	57.0	72.7	40 2231	OH	128-130
ORRVILLE I.T.	ORRVILLE	35.0	37.2	40 2421	OH	218-218



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PLUM CREEK I.T.	VERONA	0.0	0.8	40 2296	PA	187-187
PORT PERRY BR.	E FGH.(WING) & THOMSON(PERRY)	0.0	2.9	40 2219	PA	150-150
PYMATUNING I.T.	LEAVITTSBURG & YOUNGSTOWN	49.6	66.4	40 6502	OH	229-230
PYMATUNING I.T.	YOUNGSTOWN & HUBBARD	67.9	74.6	40 6502	OH	231-231
RANDALL I.T.	BROADWAY & ERIE CROSSING	2.2	5.2	40 6502	OH	225-225
RANDALL SEC.	ERIE CROSSING & AURORA	5.2	27.5	40 6502	OH	225-227
REDSTONE I.T.	BROWNSVILLE	52.1	52.6	40 2258	PA	171-171
RIVER I.T.	ROCK & GR	17.3	23.6	40 2231	OH	133-134
ROCKPORT YARD LD.	SHORT & ROCKPORT YARD	17.7	17.9	40 3531	OH	111-111
SCHENLEY I.T.	SCHENLEY & LEECHBURG	0.0	4.0	40 2242	PA	152-152
SCHENLEY I.T.	SCHENLEY	28.7	30.0	40 2229	PA	151-151
SHARON I.T.	DOUGHTON JCT.& FARREL	5.2	5.7	40 2443	OH	208-208
SILVER PLATE I.T.	CLEVELAND	0.0	1.5	40 3538	OH	216-216
SOUTHWEST I.T.	RADEBAUGH(GRADE) & COUNTY JCT.	0.0	2.5	40 2218	PA	141-141
SOUTHWEST I.T.	COUNTY JCT. & CONNELSVILLE	2.5	23.8	40 2217	PA	138-140
SPORE I.T.	SPORE & BUCYRUS	62.9	69.7	40 8130	OH	242-242
SUPERIOR I.T.	CARNEGIE	0.0	0.8	40 2288	PA	167-167
TEN MILE BR.	MILLSBORO & WAYNESBURG	0.0	17.0	40 8003	PA	255-256
TITUS I.T.	ROUSEVILLE & OIL CITY	133.8	137.5	40 2327	PA	188-188
TURTLE CREEK I.T.	TRAFFORD	0.0	0.9	40 2277	PA	174-174
UNITY I.T.	LATROBE	0.0	0.9	40 2285	PA	136-136
VALLEY I.T.	PITTSBURGH & JCT. WITH COLEMAN SEC.	0.6	4.7	40 2221	PA	149-149
VALLEY I.T.	ASPINWALL & NADINE	1.8	2.7	40 2228	PA	146-146
VALLEY I.T.	NADINE-ARNOLD	2.7	13.4	40 2229	PA	144-145
VALLEY SEC.	HONE & ASPINWALL	0.0	1.8	40 2226	PA	147-147



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VAN WERT I.T.	VAN WERT			102.2	105.5	40 8248	OH	243-243
VAN WYE I.T.	BOANNA & VAN WERT			0.0	0.5	40 2437	OH	206-206
WANA SPUR	WANA & BLACKSVILLE MINE #2			0.0	1.5	40 8007	WV	263-263
WAYNESBURG BR.	WAYNESBURG & LACK			0.0	27.1	40 8004	PA	257-259
WEIRTON SEC.	ESPLEN & WAGNER			2.4	8.0	40 2221	PA	186-186
WEIRTON SEC.	WAGNER & PA/WV ST LINE			8.0	35.1	40 2206	PA	182-185
WEIRTON SEC.	PA/WV ST/LINE & WV/OH ST/LINE			35.1	42.0	40 2206	WV	181-182
WEIRTON SEC.	WV/OH ST/LINE & MING			42.0	46.0	40 2206	OH	181-181
WELLS I.T.	WEIRTON JCT. & LAZEARVILLE			0.0	8.2	40 2235	WV	156-156
WESTBROWNSVILLE SEC	W. BROWNSVILLE & MILLSBORO			51.8	62.1	40 8002	PA	253-254
WHEATLAND I.T.	WHEATLAND & SHARPVILLE			66.0	73.0	40 2434	PA	204-204
WHEATLAND I.T.	SHENANGO & JAMESTOWN			80.9	81.7	40 2434	PA	205-205
YELLOW CREEK R.T.	RIVER & BRANCH			0.0	1.0	40 2232	OH	153-153
YUKON I.T.	HUNKER & HUTCHINSON MINE			0.0	3.0	40 2267	PA	172-172



## **EXHIBIT G**

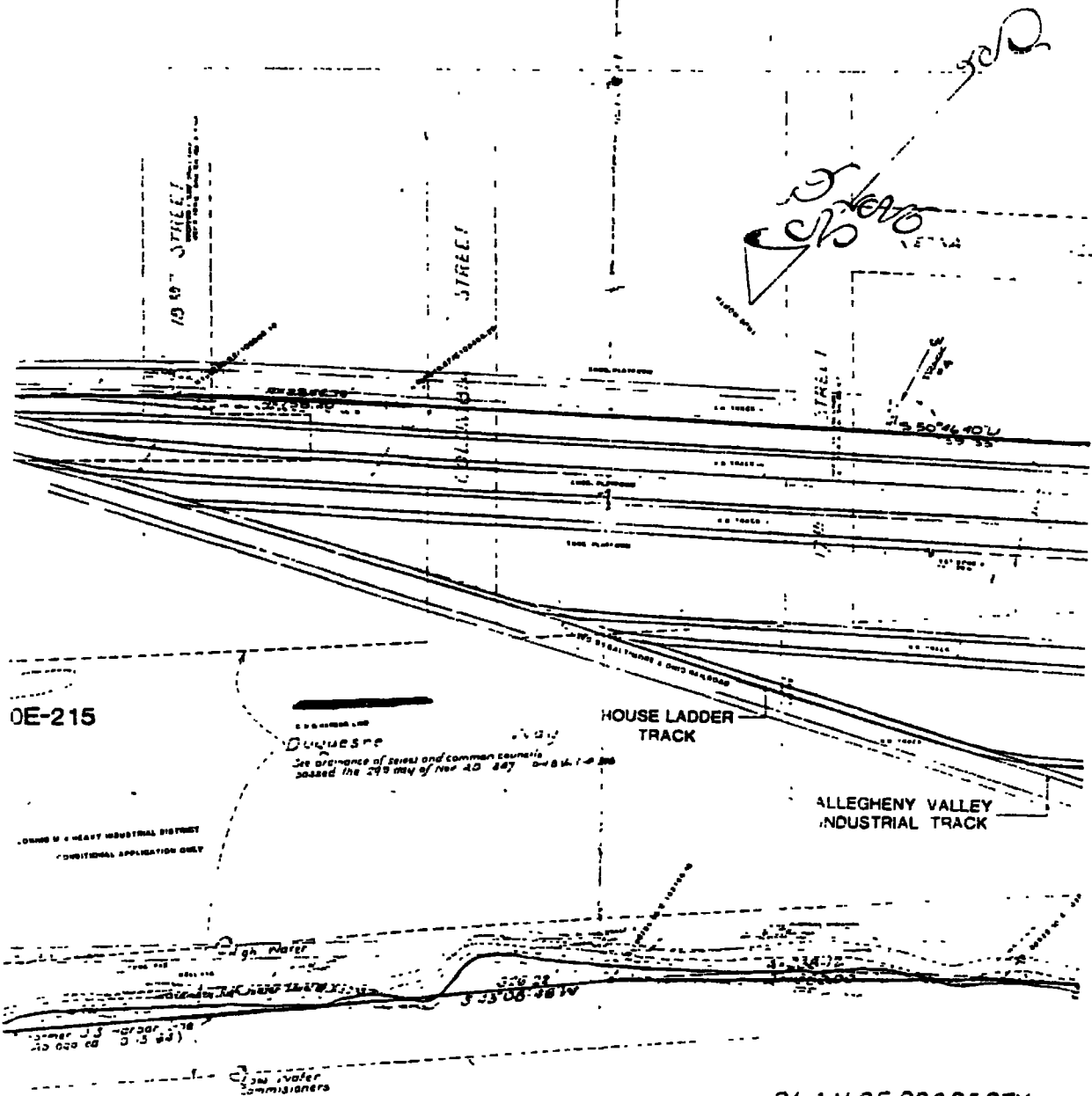
**1976 PCTC Plan of Property of the Pittsburgh Produce Yards area showing the “Allegheny Valley Industrial Track”**







PAC 102.21  
100 0015.7



OE-215

FORMED IN A HEAVY INDUSTRIAL DISTRICT  
CONDITIONAL APPLICATION ONLY

21 VER 2

PLAN OF PROPERTY  
SECOND WARD, PITTSBURGH, L.

PENN-CENTRAL TRANSPORTATION





16th St  
Variable North

S M A L L M A

BECAUSE OF THE COMPLICATED NATURE OF PREVIOUS  
PLANS, A FIELD SURVEY IS REQUIRED TO DETERMINE  
THE EXACT LOCATION OF ALL INCLUDED PARCELS AND THE EX-  
ACT LOCATION OF ALL STREETS AND EASEMENTS  
ON THE SUBJECT PROPERTY.

ALL BEARING & COORDINATES ARE REFERRED TO THE  
CITY OF PITTSBURGH COORDINATE SYSTEM

THREE  
MILE CROWN MEETING  
STATION

Produce Terminal

STREET

PAE-10E-203

PAE-10E-219

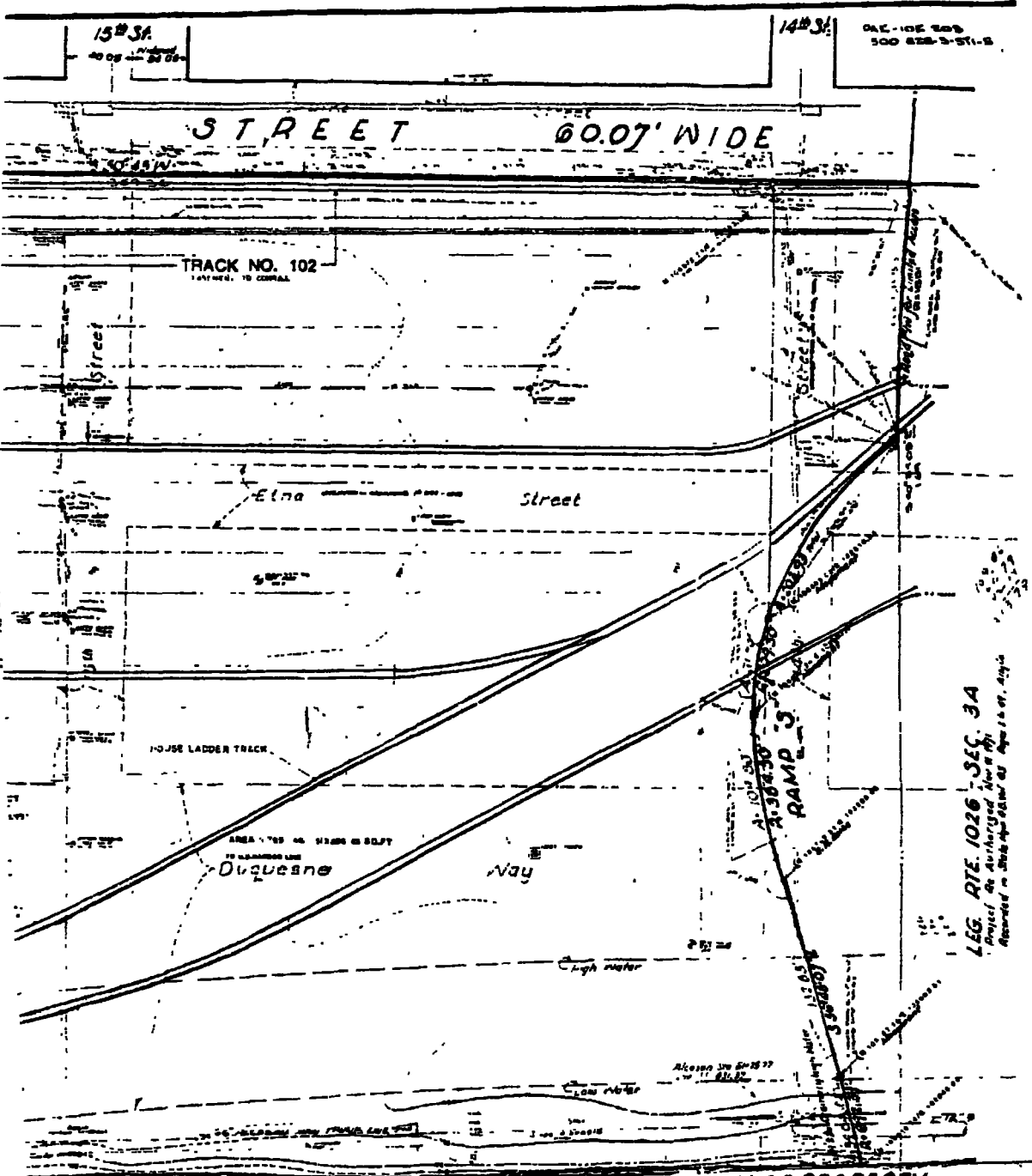
ZONE M-4 HEAVY INDUSTRIAL DISTRICT  
EXPLANATION

ALLEGHENY VALLEY  
INDUSTRIAL TRACK

ALLEGHENY

Flow





PLAN OF PROPERTY  
 Situate in  
 SECOND WARD, PITTSBURGH, PA.  
 and for  
 PENN-CENTRAL TRANSPORTATION CO



Donald W. Ritz  
 April 7, 1944  
 Professional Engineer  
 State of Pennsylvania  
 No. 11727



**CERTIFICATE OF SERVICE**

I hereby certify that on June 25, 2009, I caused the foregoing **The Buncher Company's Response To Allegheny Valley Railroad Company's Rebuttal** to be served via first class mail, postage prepaid, on the following:

Office of Mayor Luke Ravenstahl  
City of Pittsburgh  
City County Building, Fifth Floor  
414 Grant Street  
Pittsburgh, PA 15219

George Spector, City Solicitor  
Law Department  
313 City County Building  
414 Grant Street  
Pittsburgh, PA

Rob Stephany, Executive Director  
The Urban Redevelopment Authority of  
Pittsburgh  
200 Ross Street  
Pittsburgh, PA 15219-2016

Sharon O'Neill, Asst. General Counsel  
The Urban Redevelopment Authority of  
Pittsburgh  
200 Ross Street  
Pittsburgh, PA 15219-2016

Mr. Dan Onarato  
Office of the County Executive  
Courthouse  
436 Grant Street, Rm. 101  
Pittsburgh, PA 15219

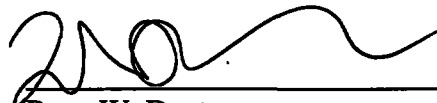
Michael H. Wojick, County Solicitor  
Allegheny County Law Dept.  
Fort Pitt Commons  
445 Fort Pitt Boulevard, Suite 300  
Pittsburgh, PA 15219

Westmoreland County Board of  
Commissioners  
Main Office  
2 North Main Street, Suite 101  
Greensburg, PA 15601

Mr. Chuck DiPietro, Transportation Dir.  
Southwestern Pennsylvania Commission  
425 Sixth Avenue, Suite 2500  
Pittsburgh, PA 15219-1852

Larry J. Larese, Executive Dir.  
Westmoreland County IDC  
40 N PA Avenue, Fifth Floor, Suite 520  
Greensburg, PA 15601

Richard R. Wilson, Esq.  
518 North Center Street, Suite 1  
Ebensburg, PA 15931

  
\_\_\_\_\_  
Peter W. Denton